

# **Exhibit 2**

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13 Fortress Investment Group LLC

14 UNITED STATES DISTRICT COURT  
15 CENTRAL DISTRICT OF CALIFORNIA

16 UNILOC 2017 LLC,  
17 Plaintiff,  
18 v.  
19 NETFLIX, INC.,  
20 Defendant.

LEAD CONSOLIDATED CASE:  
8:18-cv-02055-GW-DFM

**THIRD PARTY FORTRESS  
INVESTMENT GROUP LLC'S  
RESPONSES AND OBJECTIONS  
TO NETFLIX, INC.'S  
DOCUMENT PRODUCTION AND  
DEPOSITION SUBPOENAS**

1 Third party Fortress Investment Group LLC (“FIG”) serves the following  
2 responses and objections to the June 17, 2020 subpoena duces tecum and subpoena  
3 ad testificandum (collectively, “Subpoena”) served by Defendant Netflix, Inc. in the  
4 above-entitled case (“Netflix Litigation”).

### 5 **GENERAL OBJECTIONS**

6 The following objections apply to Netflix’s Subpoena. To the extent any  
7 specific objection is also made to a particular Request for Production (“Request”) or Deposition Topic (“Topic”), FIG does not waive or otherwise limit any general  
8 objection.  
9

10 1. FIG objects to the Subpoena on the grounds that the date for  
11 compliance of the documents requests and to provide deposition testimony is  
12 unreasonable, unduly burdensome, and harassing. Given the unduly broad  
13 Requests and Topics, FIG needs sufficient time to properly investigate, analyze,  
14 and respond to the Subpoena.

15 2. FIG objects to the Subpoena to the extent it seeks information  
16 protected by the attorney-client privilege, the attorney work-product immunity  
17 doctrine, the common interest privilege, and any other applicable privilege or  
18 protection, and any inadvertent production shall not be deemed a waiver off any  
19 privilege with respect to the documents or information produced or of any work-  
20 product immunity doctrine that may attach. Accordingly, FIG objects to producing  
21 any documents or testimony protected by, for example, Fed. R. Evid. 501.

22 3. FIG objects to the Subpoena as overly broad, unduly burdensome and  
23 oppressive to the extent that it is indefinite as to time or scope or otherwise not  
24 limited to a time frame relevant to issues in the Netflix Litigation.

25 4. FIG objects to the Subpoena as unduly burdensome to the extent it  
26 seeks information already in Netflix’s possession.

27 5. FIG objects to the Requests and Topics to the extent they purport to  
28 cover material relevant to patents found to be invalid, patents dismissed from the

1 Netflix Litigation, or products not at issue in the Netflix Litigation.

2 6. FIG objects to these Requests and Topics to the extent they purport to  
3 cover material relevant to patents other than the patents asserted in the Netflix  
4 Litigation.

5 7. FIG objects to the Subpoena, and the Definitions and Instructions  
6 thereto, to the extent they seek to impose obligations on FIG that are inconsistent  
7 with and/or beyond the scope of those imposed or authorized by the Federal Rules  
8 of Civil Procedure, the Local Rules, or the rules or decisions of this Court.

9 8. FIG objects to the Subpoena's Instructions as oppressive, overly broad,  
10 unduly burdensome, unreasonable, and in contravention of the Federal Rules of  
11 Civil Procedure and other applicable legal authority.

12 9. FIG objects to each individual Request and Topic to the extent it is  
13 vague, ambiguous, nonsensical, oppressive, overly broad, unduly burdensome,  
14 unreasonably cumulative or duplicative, seeks information that is more  
15 conveniently or less expensively obtained from another source including a party in  
16 this action (*e.g.*, Uniloc 2017), or seeks information that is not proportional to the  
17 needs of the Netflix Litigation.

18 10. FIG objects to each Request and Topic to the extent that it calls for  
19 information not within the scope of knowledge of any FIG representative. To do so  
20 would place an undue burden on FIG, require more of FIG than any obligation  
21 imposed by law, would subject FIG to unreasonable and undue burden and expense,  
22 and would seek to impose upon FIG an obligation to investigate or discover  
23 information or materials from third parties or sources that are equally accessible to  
24 Netflix.

25 11. FIG objects to each Request and Topic to the extent that it seeks  
26 information not relevant to the subject matter of this action or to a claim or defense,  
27 currently part of the Netflix Litigation, of any party and/or is not proportional to the  
28 needs of the Netflix Litigation.

12. FIG objects to the Subpoena to the extent it seeks information subject to a nondisclosure or confidentiality agreement with a third party and/or the trade secrets, or information confidential and proprietary to, a third party.

13. FIG objects to the Requests and Topics to the extent that they require FIG to provide information that is not kept by FIG in the normal course of business. FIG objects to the Requests and Topics to the extent they seek documents and information that are no longer active or readily accessible on FIG databases but might exist in electronic archives or back-up files. FIG will not rebuild these electronic archives and back-up files in order to search for documents that may be responsive to the Requests or Topics.

14. FIG objects to the Requests and Topics to the extent that they require FIG to search for and produce email in contravention of the E-Discovery Order (“ESI Order”) that was entered July 3, 2019 (Dkt. No. 75). FIG will not search for email that may purportedly be responsive to the Requests or Topics.

15. FIG objects to Netflix’s definition of “You” and “Your” to the extent that it includes third parties that are legally independent of FIG and on whose behalf FIG cannot respond. Accordingly, FIG will respond only on behalf of itself.

16. FIG objects to Netflix’s definition of “Uniloc” as vague, ambiguous, nonsensical, oppressive, overly broad and unduly burdensome. Accordingly, to the extent proper and feasible, FIG will construe “Uniloc” to mean specifically Uniloc Luxembourg S.à.r.l (f.k.a. Uniloc Luxembourg S.A.).

17. FIG objects to Netflix’s definition of “Pendrell” as vague, ambiguous, nonsensical, oppressive, overly broad and unduly burdensome. Accordingly, to the extent proper and feasible, FIG will construe “Pendrell” to mean specifically Pendrell Technologies LLC.

18. FIG objects to Netflix’s definition of “LINQware” as vague, ambiguous, nonsensical, oppressive, overly broad and unduly burdensome. Accordingly, to the extent proper and feasible, FIG will construe “LINQware” to

1 mean specifically LINQware, Inc.

2 19. FIG objects to Netflix's definition of "Communication(s)" and  
3 "communicate(s)" to the extent that it seeks to impose obligations different from  
4 and/or in addition to the Federal Rules of Civil Procedure or the Local Rules of this  
5 Court.

6 20. FIG objects to Netflix's definition of "Document" and "Documents" to  
7 the extent that it seeks to impose obligations different from and/or in addition to the  
8 Federal Rules of Civil Procedure or the Local Rules of this Court.

9 21. FIG objects to Netflix's definition of "Identify," "identifying," and  
10 "identification" to the extent that it seeks to impose obligations different from  
11 and/or in addition to the Federal Rules of Civil Procedure or the Local Rules of this  
12 Court.

13 22. Each of the above General Objections shall be deemed continuing and  
14 is incorporated into the specific responses set forth below, whether or not  
15 specifically stated in response to each Request, and is not waived or in any way  
16 limited by the responses below. No response to a Request shall be understood as,  
17 nor is it intended to be, a waiver of any General Objection or any Specific  
18 Objection that may be separately stated with respect to any response. Nor shall any  
19 response to a Request be deemed to constitute any agreement or concession that the  
20 subject matter thereof is relevant to this action. All of the responses set forth below  
21 are made without waiving or intending to waive any objection, including but not  
22 limited to objections as to competency, relevancy, materiality, authenticity,  
23 privilege, or admissibility.

## 24 **RESPONSE TO DOCUMENT REQUESTS**

### 25 **REQUEST NO. 1.**

26 All articles of organization for You and Uniloc 2017.

### 27 **RESPONSE TO REQUEST NO. 1.**

28 In addition to the General Objections, all of which are incorporated by

1 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
2 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
3 non-party to the Netflix Litigation, that Netflix can obtain from other sources,  
4 including Uniloc 2017. FIG also objects to this Request in that it seeks documents  
5 that are not relevant to any claims or defenses in the Netflix Litigation and is  
6 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
7 to this Request to the extent it seeks information protected by the attorney-client  
8 privilege, the attorney work-product immunity doctrine, the common interest  
9 privilege, and any other applicable privilege or protection. FIG also objects to this  
10 Request to the extent it seeks third-party documents that FIG is obligated to keep  
11 confidential.

12 On all of these grounds, FIG objects to producing, and will not produce, any  
13 documents responsive to this Request.

14 **REQUEST NO. 2.**

15 Documents sufficient to identify persons with a membership interest in You  
16 and/or Uniloc 2017.

17 **RESPONSE TO REQUEST NO. 2.**

18 In addition to the General Objections, all of which are incorporated by  
19 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
20 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
21 non-party to the Netflix Litigation, that Netflix can obtain from other sources,  
22 including Uniloc 2017. FIG also objects to this Request in that it seeks documents  
23 that are not relevant to any claims or defenses in the Netflix Litigation and is  
24 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
25 to this Request to the extent it seeks information protected by the attorney-client  
26 privilege, the attorney work-product immunity doctrine, the common interest  
27 privilege, and any other applicable privilege or protection. FIG also objects to this  
28 Request to the extent it seeks third-party documents that FIG is obligated to keep

1 confidential.

2 On all of these grounds, FIG objects to producing, and will not produce, any  
3 documents responsive to this Request.

4 **REQUEST NO. 3.**

5 Documents sufficient to identify all of Your and Uniloc 2017's present  
6 members, managers, officers, employees, and agents.

7 **RESPONSE TO REQUEST NO. 3.**

8 In addition to the General Objections, all of which are incorporated by  
9 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
10 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
11 non-party to the Netflix Litigation, that Netflix can obtain from other sources,  
12 including Uniloc 2017. FIG also objects to this Request in that it seeks documents  
13 that are not relevant to any claims or defenses in the Netflix Litigation and is  
14 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
15 to this Request to the extent it seeks information protected by the attorney-client  
16 privilege, the attorney work-product immunity doctrine, the common interest  
17 privilege, and any other applicable privilege or protection. FIG also objects to this  
18 Request to the extent it seeks third-party documents that FIG is obligated to keep  
19 confidential.

20 On all of these grounds, FIG objects to producing, and will not produce, any  
21 documents responsive to this Request.

22 **REQUEST NO. 4.**

23 All Documents relating to the business relationship between You and Uniloc,  
24 including the date the relationship began and the scope of the relationship.

25 **RESPONSE TO REQUEST NO. 4.**

26 In addition to the General Objections, all of which are incorporated by  
27 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
28 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
non-party to the Netflix Litigation, that Netflix can obtain from other sources,

1 including Uniloc 2017. FIG also objects to this Request in that it seeks documents  
2 that are not relevant to any claims or defenses in the Netflix Litigation and is  
3 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
4 to this Request to the extent it seeks information protected by the attorney-client  
5 privilege, the attorney work-product immunity doctrine, the common interest  
6 privilege, and any other applicable privilege or protection. FIG also objects to this  
7 Request to the extent it seeks third-party documents that FIG is obligated to keep  
8 confidential. FIG objects to this Request to the extent it requires FIG to search for  
9 and produce email in contravention of the applicable ESI Order entered in the  
10 Netflix Litigation.

11 On all of these grounds, FIG objects to producing, and will not produce, any  
12 documents responsive to this Request.

13 **REQUEST NO. 5.**

14 All agreements entered into between You and Uniloc.

15 **RESPONSE TO REQUEST NO. 5.**

16 In addition to the General Objections, all of which are incorporated by  
17 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
18 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
19 non-party to the Netflix Litigation, that Netflix can obtain from other sources,  
20 including Uniloc 2017. FIG also objects to this Request in that it seeks documents  
21 that are not relevant to any claims or defenses in the Netflix Litigation and is  
22 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
23 to this Request to the extent it seeks information protected by the attorney-client  
24 privilege, the attorney work-product immunity doctrine, the common interest  
25 privilege, and any other applicable privilege or protection. FIG also objects to this  
26 Request to the extent it seeks third-party documents that FIG is obligated to keep  
27 confidential.

28 On all of these grounds, FIG objects to producing, and will not produce, any

documents responsive to this Request.

**REQUEST NO. 6.**

All Documents relating to the business relationship between You and Uniloc 2017, including the date the relationship began and the scope of the relationship.

**RESPONSE TO REQUEST NO. 6.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Request as vague, ambiguous, overly broad and unduly burdensome to the extent that it seeks documents from FIG, a non-party to the Netflix Litigation, that Netflix can obtain from other sources, including Uniloc 2017. FIG also objects to this Request in that it seeks documents that are not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Request to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Request to the extent it seeks third-party documents that FIG is obligated to keep confidential. FIG objects to this Request to the extent it requires FIG to search for and produce email in contravention of the applicable ESI Order entered in the Netflix Litigation.

On all of these grounds, FIG objects to producing, and will not produce, any documents responsive to this Request.

**REQUEST NO. 7.**

All agreements entered into between You and Uniloc 2017.

**RESPONSE TO REQUEST NO. 7.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Request as vague, ambiguous, overly broad and unduly burdensome to the extent that it seeks documents from FIG, a non-party to the Netflix Litigation, that Netflix can obtain from other sources, including Uniloc 2017. FIG also objects to this Request in that it seeks documents

1 that are not relevant to any claims or defenses in the Netflix Litigation and is  
2 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
3 to this Request to the extent it seeks information protected by the attorney-client  
4 privilege, the attorney work-product immunity doctrine, the common interest  
5 privilege, and any other applicable privilege or protection. FIG also objects to this  
6 Request to the extent it seeks third-party documents that FIG is obligated to keep  
7 confidential.

8 On all of these grounds, FIG objects to producing, and will not produce, any  
9 documents responsive to this Request.

10 **REQUEST NO. 8.**

11 All Documents relating to the formation, creation, ownership, funding, and  
12 operation of Uniloc 2017.

13 **RESPONSE TO REQUEST NO. 8.**

14 In addition to the General Objections, all of which are incorporated by  
15 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
16 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
17 non-party to the Netflix Litigation, that Netflix can obtain from other sources,  
18 including Uniloc 2017. FIG also objects to this Request in that it seeks documents  
19 that are not relevant to any claims or defenses in the Netflix Litigation and is  
20 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
21 to this Request to the extent it seeks information protected by the attorney-client  
22 privilege, the attorney work-product immunity doctrine, the common interest  
23 privilege, and any other applicable privilege or protection. FIG also objects to this  
24 Request to the extent it seeks third-party documents that FIG is obligated to keep  
25 confidential. FIG objects to this Request to the extent it requires FIG to search for  
26 and produce email in contravention of the applicable ESI Order entered in the  
27 Netflix Litigation.

28 On all of these grounds, FIG objects to producing, and will not produce, any

documents responsive to this Request.

**REQUEST NO. 9.**

Documents sufficient to show Your revenues, expenses, and profits from patent asserting activities since 2013.

**RESPONSE TO REQUEST NO. 9.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Request as vague, ambiguous, overly broad and unduly burdensome to the extent that it seeks documents from FIG, a non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks documents that are not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Request to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Request to the extent it seeks third-party documents that FIG is obligated to keep confidential.

On all of these grounds, FIG objects to producing, and will not produce, any documents responsive to this Request.

**REQUEST NO. 10.**

All Documents relating to Your policies, practices, and customs concerning patent asserting activities since 2013.

**RESPONSE TO REQUEST NO. 10.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Request as vague, ambiguous, overly broad and unduly burdensome to the extent that it seeks documents from FIG, a non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks documents that are not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Request to the extent it seeks information protected by the attorney-

1 client privilege, the attorney work-product immunity doctrine, the common interest  
2 privilege, and any other applicable privilege or protection. FIG also objects to this  
3 Request to the extent it seeks third-party documents that FIG is obligated to keep  
4 confidential. FIG objects to this Request to the extent it requires FIG to search for  
5 and produce email in contravention of the applicable ESI Order entered in the  
6 Netflix Litigation.

7 On all of these grounds, FIG objects to producing, and will not produce, any  
8 documents responsive to this Request.

9 **REQUEST NO. 11.**

10 All Documents relating to IPG Electronics 502 Limited's acquisition of  
11 patents including the '229 Patent from Electronics and Telecommunications  
12 Research Institute (ETRI).

12 **RESPONSE TO REQUEST NO. 11.**

13 In addition to the General Objections, all of which are incorporated by  
14 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
15 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
16 non-party to the Netflix Litigation, that Netflix can obtain from other sources,  
17 including Uniloc 2017. FIG also objects to this Request in that it seeks documents  
18 that are not relevant to any claims or defenses in the Netflix Litigation and is  
19 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
20 to this Request to the extent it seeks information protected by the attorney-client  
21 privilege, the attorney work-product immunity doctrine, the common interest  
22 privilege, and any other applicable privilege or protection. FIG also objects to this  
23 Request to the extent it seeks third-party documents that FIG is obligated to keep  
24 confidential. FIG objects to this Request to the extent it requires FIG to search for  
25 and produce email in contravention of the applicable ESI Order entered in the  
26 Netflix Litigation.

27 On all of these grounds, FIG objects to producing, and will not produce, any  
28 documents responsive to this Request.

**REQUEST NO. 12.**

All Documents relating to Pendrell's acquisition of patents including the '229 Patent from IPG Electronics 502 Limited.

**RESPONSE TO REQUEST NO. 12.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Request as vague, ambiguous, overly broad and unduly burdensome to the extent that it seeks documents from FIG, a non-party to the Netflix Litigation, that Netflix can obtain from other sources, including Uniloc 2017. FIG also objects to this Request in that it seeks documents that are not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Request to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Request to the extent it seeks third-party documents that FIG is obligated to keep confidential. FIG objects to this Request to the extent it requires FIG to search for and produce email in contravention of the applicable ESI Order entered in the Netflix Litigation.

On all of these grounds, FIG objects to producing, and will not produce, any documents responsive to this Request.

**REQUEST NO. 13.**

All Documents relating to Uniloc's acquisition of the Pendrell Portfolio patents from Pendrell, including but not limited to all agreements, memoranda, and analyses related to such acquisition.

**RESPONSE TO REQUEST NO. 13.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Request as vague, ambiguous, overly broad and unduly burdensome to the extent that it seeks documents from FIG, a non-party to the Netflix Litigation, that Netflix can obtain from other sources,

1 including Uniloc 2017. FIG also objects to this Request in that it seeks documents  
2 that are not relevant to any claims or defenses in the Netflix Litigation and is  
3 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
4 to this Request to the extent it seeks information protected by the attorney-client  
5 privilege, the attorney work-product immunity doctrine, the common interest  
6 privilege, and any other applicable privilege or protection. FIG also objects to this  
7 Request to the extent it seeks third-party documents that FIG is obligated to keep  
8 confidential. FIG objects to this Request to the extent it requires FIG to search for  
9 and produce email in contravention of the applicable ESI Order entered in the  
10 Netflix Litigation.

11 On all of these grounds, FIG objects to producing, and will not produce, any  
12 documents responsive to this Request.

13 **REQUEST NO. 14.**

14 All Communications with Uniloc relating to the acquisition of the Pendrell  
15 Portfolio patents.

16 **RESPONSE TO REQUEST NO. 14.**

17 In addition to the General Objections, all of which are incorporated by  
18 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
19 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
20 non-party to the Netflix Litigation, that Netflix can obtain from other sources,  
21 including Uniloc 2017. FIG also objects to this Request in that it seeks documents  
22 that are not relevant to any claims or defenses in the Netflix Litigation and is  
23 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
24 to this Request to the extent it seeks information protected by the attorney-client  
25 privilege, the attorney work-product immunity doctrine, the common interest  
26 privilege, and any other applicable privilege or protection. FIG also objects to this  
27 Request to the extent it seeks third-party documents that FIG is obligated to keep  
28 confidential. FIG objects to this Request to the extent it requires FIG to search for

1 and produce email in contravention of the applicable ESI Order entered in the  
2 Netflix Litigation.

3 On all of these grounds, FIG objects to producing, and will not produce, any  
4 documents responsive to this Request.

5 **REQUEST NO. 15.**

6 All Communications with Pendrell relating to the acquisition of the Pendrell  
7 Portfolio patents.

8 **RESPONSE TO REQUEST NO. 15.**

9 In addition to the General Objections, all of which are incorporated by  
10 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
11 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
12 non-party to the Netflix Litigation, that Netflix can obtain from other sources,  
13 including Uniloc 2017. FIG also objects to this Request in that it seeks documents  
14 that are not relevant to any claims or defenses in the Netflix Litigation and is  
15 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
16 to this Request to the extent it seeks information protected by the attorney-client  
17 privilege, the attorney work-product immunity doctrine, the common interest  
18 privilege, and any other applicable privilege or protection. FIG also objects to this  
19 Request to the extent it seeks third-party documents that FIG is obligated to keep  
20 confidential. FIG objects to this Request to the extent it requires FIG to search for  
21 and produce email in contravention of the applicable ESI Order entered in the  
22 Netflix Litigation.

23 On all of these grounds, FIG objects to producing, and will not produce, any  
24 documents responsive to this Request.

25 **REQUEST NO. 16.**

26 All agreements and licenses between You and Uniloc concerning any rights  
27 to any of the Pendrell Portfolio patents.

28 **RESPONSE TO REQUEST NO. 16.**

In addition to the General Objections, all of which are incorporated by

1 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
2 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
3 non-party to the Netflix Litigation, that Netflix can obtain from other sources,  
4 including Uniloc 2017. FIG also objects to this Request in that it seeks documents  
5 that are not relevant to any claims or defenses in the Netflix Litigation and is  
6 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
7 to this Request to the extent it seeks information protected by the attorney-client  
8 privilege, the attorney work-product immunity doctrine, the common interest  
9 privilege, and any other applicable privilege or protection. FIG also objects to this  
10 Request to the extent it seeks third-party documents that FIG is obligated to keep  
11 confidential.

12 On all of these grounds, FIG objects to producing, and will not produce, any  
13 documents responsive to this Request.

14 **REQUEST NO. 17.**

15 All Documents and Communications relating to any valuations of any of the  
16 Pendrell Portfolio patents.

17 **RESPONSE TO REQUEST NO. 17.**

18 In addition to the General Objections, all of which are incorporated by  
19 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
20 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
21 non-party to the Netflix Litigation, that Netflix can obtain from other sources,  
22 including Uniloc 2017. FIG also objects to this Request in that it seeks documents  
23 that are not relevant to any claims or defenses in the Netflix Litigation and is  
24 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
25 to this Request to the extent it seeks information protected by the attorney-client  
26 privilege, the attorney work-product immunity doctrine, the common interest  
27 privilege, and any other applicable privilege or protection. FIG also objects to this  
28 Request to the extent it seeks third-party documents that FIG is obligated to keep

1 confidential. FIG objects to this Request to the extent it requires FIG to search for  
2 and produce email in contravention of the applicable ESI Order entered in the  
3 Netflix Litigation.

4 On all of these grounds, FIG objects to producing, and will not produce, any  
5 documents responsive to this Request.

6 **REQUEST NO. 18.**

7 All Documents relating to Uniloc's acquisition of the LINQware Portfolio  
8 patents from LINQware, including but not limited to all agreements, memoranda,  
9 and analyses related to such acquisition.

9 **RESPONSE TO REQUEST NO. 18.**

10 In addition to the General Objections, all of which are incorporated by  
11 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
12 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
13 non-party to the Netflix Litigation, that Netflix can obtain from other sources,  
14 including Uniloc 2017. FIG also objects to this Request in that it seeks documents  
15 that are not relevant to any claims or defenses in the Netflix Litigation and is  
16 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
17 to this Request to the extent it seeks information protected by the attorney-client  
18 privilege, the attorney work-product immunity doctrine, the common interest  
19 privilege, and any other applicable privilege or protection. FIG also objects to this  
20 Request to the extent it seeks third-party documents that FIG is obligated to keep  
21 confidential. FIG objects to this Request to the extent it requires FIG to search for  
22 and produce email in contravention of the applicable ESI Order entered in the  
23 Netflix Litigation.

24 On all of these grounds, FIG objects to producing, and will not produce, any  
25 documents responsive to this Request.

26 **REQUEST NO. 19.**

27 All Communications with Uniloc relating to the acquisition of the LINQware  
28 Portfolio patents.

**RESPONSE TO REQUEST NO. 19.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Request as vague, ambiguous, overly broad and unduly burdensome to the extent that it seeks documents from FIG, a non-party to the Netflix Litigation, that Netflix can obtain from other sources, including Uniloc 2017. FIG also objects to this Request in that it seeks documents that are not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Request to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Request to the extent it seeks third-party documents that FIG is obligated to keep confidential. FIG objects to this Request to the extent it requires FIG to search for and produce email in contravention of the applicable ESI Order entered in the Netflix Litigation.

On all of these grounds, FIG objects to producing, and will not produce, any documents responsive to this Request.

**REQUEST NO. 20.**

All Communications with LINQware relating to the acquisition of the LINQware Portfolio patents.

**RESPONSE TO REQUEST NO. 20.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Request as vague, ambiguous, overly broad and unduly burdensome to the extent that it seeks documents from FIG, a non-party to the Netflix Litigation, that Netflix can obtain from other sources, including Uniloc 2017. FIG also objects to this Request in that it seeks documents that are not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects

1 to this Request to the extent it seeks information protected by the attorney-client  
2 privilege, the attorney work-product immunity doctrine, the common interest  
3 privilege, and any other applicable privilege or protection. FIG also objects to this  
4 Request to the extent it seeks third-party documents that FIG is obligated to keep  
5 confidential. FIG objects to this Request to the extent it requires FIG to search for  
6 and produce email in contravention of the applicable ESI Order entered in the  
7 Netflix Litigation.

8 On all of these grounds, FIG objects to producing, and will not produce, any  
9 documents responsive to this Request.

10 **REQUEST NO. 21.**

11 All agreements and licenses between You and Uniloc concerning any rights  
12 to any of the LINQware Portfolio patents.

13 **RESPONSE TO REQUEST NO. 21.**

14 In addition to the General Objections, all of which are incorporated by  
15 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
16 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
17 non-party to the Netflix Litigation, that Netflix can obtain from other sources,  
18 including Uniloc 2017. FIG also objects to this Request in that it seeks documents  
19 that are not relevant to any claims or defenses in the Netflix Litigation and is  
20 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
21 to this Request to the extent it seeks information protected by the attorney-client  
22 privilege, the attorney work-product immunity doctrine, the common interest  
23 privilege, and any other applicable privilege or protection. FIG also objects to this  
24 Request to the extent it seeks third-party documents that FIG is obligated to keep  
25 confidential.

26 On all of these grounds, FIG objects to producing, and will not produce, any  
27 documents responsive to this Request.

28 **REQUEST NO. 22.**

All Documents and Communications relating to any valuations of any of the

1 LINQware Portfolio patents.

2 **RESPONSE TO REQUEST NO. 22.**

3 In addition to the General Objections, all of which are incorporated by  
4 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
5 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
6 non-party to the Netflix Litigation, that Netflix can obtain from other sources,  
7 including Uniloc 2017. FIG also objects to this Request in that it seeks documents  
8 that are not relevant to any claims or defenses in the Netflix Litigation and is  
9 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
10 to this Request to the extent it seeks information protected by the attorney-client  
11 privilege, the attorney work-product immunity doctrine, the common interest  
12 privilege, and any other applicable privilege or protection. FIG also objects to this  
13 Request to the extent it seeks third-party documents that FIG is obligated to keep  
14 confidential. FIG objects to this Request to the extent it requires FIG to search for  
15 and produce email in contravention of the applicable ESI Order entered in the  
16 Netflix Litigation.

17 On all of these grounds, FIG objects to producing, and will not produce, any  
18 documents responsive to this Request.

19 **REQUEST NO. 23.**

20 All Documents and Communications relating to Uniloc 2017's acquisition of  
21 the Uniloc Asserted Patents from Uniloc Luxembourg S.A.

22 **RESPONSE TO REQUEST NO. 23.**

23 In addition to the General Objections, all of which are incorporated by  
24 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
25 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
26 non-party to the Netflix Litigation, that Netflix can obtain from other sources,  
27 including Uniloc 2017. FIG also objects to this Request in that it seeks documents  
28 that are not relevant to any claims or defenses in the Netflix Litigation and is

1 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
2 to this Request to the extent it seeks information protected by the attorney-client  
3 privilege, the attorney work-product immunity doctrine, the common interest  
4 privilege, and any other applicable privilege or protection. FIG also objects to this  
5 Request to the extent it seeks third-party documents that FIG is obligated to keep  
6 confidential. FIG objects to this Request to the extent it requires FIG to search for  
7 and produce email in contravention of the applicable ESI Order entered in the  
8 Netflix Litigation.

9 On all of these grounds, FIG objects to producing, and will not produce, any  
10 documents responsive to this Request.

11 **REQUEST NO. 24.**

12 All Documents and Communications relating to any valuations of any of the  
13 Uniloc Asserted Patents or any patent portfolio(s) that include any of the Uniloc  
14 Asserted Patents.

14 **RESPONSE TO REQUEST NO. 24.**

15 In addition to the General Objections, all of which are incorporated by  
16 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
17 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
18 non-party to the Netflix Litigation, that Netflix can obtain from other sources,  
19 including Uniloc 2017. FIG also objects to this Request in that it seeks documents  
20 that are not relevant to any claims or defenses in the Netflix Litigation and is  
21 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
22 to this Request to the extent it seeks information protected by the attorney-client  
23 privilege, the attorney work-product immunity doctrine, the common interest  
24 privilege, and any other applicable privilege or protection. FIG also objects to this  
25 Request to the extent it seeks third-party documents that FIG is obligated to keep  
26 confidential. FIG objects to this Request to the extent it requires FIG to search for  
27 and produce email in contravention of the applicable ESI Order entered in the  
28 Netflix Litigation.

1 On all of these grounds, FIG objects to producing, and will not produce, any  
2 documents responsive to this Request.

3 **REQUEST NO. 25.**

4 All Documents and Communications relating to any valuations of any of the  
5 Uniloc Asserted Patents or any patent portfolio(s) that include any of the Uniloc  
6 Asserted Patents compared with Your entire patent portfolio.

6 **RESPONSE TO REQUEST NO. 25.**

7 In addition to the General Objections, all of which are incorporated by  
8 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
9 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
10 non-party to the Netflix Litigation, that Netflix can obtain from other sources,  
11 including Uniloc 2017. FIG also objects to this Request in that it seeks documents  
12 that are not relevant to any claims or defenses in the Netflix Litigation and is  
13 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
14 to this Request to the extent it seeks information protected by the attorney-client  
15 privilege, the attorney work-product immunity doctrine, the common interest  
16 privilege, and any other applicable privilege or protection. FIG also objects to this  
17 Request to the extent it seeks third-party documents that FIG is obligated to keep  
18 confidential. FIG objects to this Request to the extent it requires FIG to search for  
19 and produce email in contravention of the applicable ESI Order entered in the  
20 Netflix Litigation.

21 On all of these grounds, FIG objects to producing, and will not produce, any  
22 documents responsive to this Request.

23 **REQUEST NO. 26.**

24 All Documents and Communications relating to any license agreements  
25 conferring any rights to any of the Uniloc Asserted Patents or any patent  
26 portfolio(s) that include any of the Uniloc Asserted Patents, including licenses  
27 entered into by You, Uniloc, Uniloc 2017, or any prior assignee.

27 **RESPONSE TO REQUEST NO. 26.**

28 In addition to the General Objections, all of which are incorporated by

specific reference herein, FIG objects to this Request as vague, ambiguous, overly broad and unduly burdensome to the extent that it seeks documents from FIG, a non-party to the Netflix Litigation, that Netflix can obtain from other sources, including Uniloc 2017. FIG also objects to this Request in that it seeks documents that are not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Request to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Request to the extent it seeks third-party documents that FIG is obligated to keep confidential. FIG objects to this Request to the extent it requires FIG to search for and produce email in contravention of the applicable ESI Order entered in the Netflix Litigation.

On all of these grounds, FIG objects to producing, and will not produce, any documents responsive to this Request.

**REQUEST NO. 27.**

All Documents and Communications relating to any agreements conferring any financial, ownership, or security interests to any of the Uniloc Asserted Patents or any patent portfolio(s) that include any of the Uniloc Asserted Patents.

**RESPONSE TO REQUEST NO. 27.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Request as vague, ambiguous, overly broad and unduly burdensome to the extent that it seeks documents from FIG, a non-party to the Netflix Litigation, that Netflix can obtain from other sources, including Uniloc 2017. FIG also objects to this Request in that it seeks documents that are not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Request to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest

1 privilege, and any other applicable privilege or protection. FIG also objects to this  
2 Request to the extent it seeks third-party documents that FIG is obligated to keep  
3 confidential. FIG objects to this Request to the extent it requires FIG to search for  
4 and produce email in contravention of the applicable ESI Order entered in the  
5 Netflix Litigation.

6 On all of these grounds, FIG objects to producing, and will not produce, any  
7 documents responsive to this Request.

8 **REQUEST NO. 28.**

9 All Communications regarding any of the Uniloc Asserted Patents involving  
10 You, Uniloc 2017, Uniloc, Pendrell, or LINQware.

11 **RESPONSE TO REQUEST NO. 28.**

12 In addition to the General Objections, all of which are incorporated by  
13 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
14 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
15 non-party to the Netflix Litigation, that Netflix can obtain from other sources,  
16 including Uniloc 2017. FIG also objects to this Request in that it seeks documents  
17 that are not relevant to any claims or defenses in the Netflix Litigation and is  
18 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
19 to this Request to the extent it seeks information protected by the attorney-client  
20 privilege, the attorney work-product immunity doctrine, the common interest  
21 privilege, and any other applicable privilege or protection. FIG also objects to this  
22 Request to the extent it seeks third-party documents that FIG is obligated to keep  
23 confidential. FIG objects to this Request to the extent it requires FIG to search for  
24 and produce email in contravention of the applicable ESI Order entered in the  
Netflix Litigation.

25 On all of these grounds, FIG objects to producing, and will not produce, any  
26 documents responsive to this Request.

27 **REQUEST NO. 29.**

28 All Communications regarding any of the Uniloc Asserted Patents involving

1 any person or entity accused of infringing any of the Uniloc Asserted Patents.

2 **RESPONSE TO REQUEST NO. 29.**

3 In addition to the General Objections, all of which are incorporated by  
4 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
5 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
6 non-party to the Netflix Litigation, that Netflix can obtain from other sources,  
7 including Uniloc 2017. FIG also objects to this Request in that it seeks documents  
8 that are not relevant to any claims or defenses in the Netflix Litigation and is  
9 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
10 to this Request to the extent it seeks information protected by the attorney-client  
11 privilege, the attorney work-product immunity doctrine, the common interest  
12 privilege, and any other applicable privilege or protection. FIG also objects to this  
13 Request to the extent it seeks third-party documents that FIG is obligated to keep  
14 confidential. FIG objects to this Request to the extent it requires FIG to search for  
15 and produce email in contravention of the applicable ESI Order entered in the  
16 Netflix Litigation.

17 On all of these grounds, FIG objects to producing, and will not produce, any  
18 documents responsive to this Request.

19 **REQUEST NO. 30.**

20 All Communications regarding any of the Uniloc Asserted Patents and  
21 Netflix.

22 **RESPONSE TO REQUEST NO. 30.**

23 In addition to the General Objections, all of which are incorporated by  
24 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
25 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
26 non-party to the Netflix Litigation, that Netflix can obtain from other sources,  
27 including Uniloc 2017. FIG also objects to this Request in that it seeks documents  
28 that are not relevant to any claims or defenses in the Netflix Litigation and is

1 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
2 to this Request to the extent it seeks information protected by the attorney-client  
3 privilege, the attorney work-product immunity doctrine, the common interest  
4 privilege, and any other applicable privilege or protection. FIG also objects to this  
5 Request to the extent it seeks third-party documents that FIG is obligated to keep  
6 confidential. FIG objects to this Request to the extent it requires FIG to search for  
7 and produce email in contravention of the applicable ESI Order entered in the  
8 Netflix Litigation.

9 On all of these grounds, FIG objects to producing, and will not produce, any  
10 documents responsive to this Request.

11 **REQUEST NO. 31.**

12 Documents sufficient to show Your and Uniloc 2017's financial condition  
13 between 2013 and the present including but not limited to balance sheets, income  
14 statements, profit and loss statements, cash flow statements, and other financial  
documents reflecting Your and Uniloc 2017's revenues, profits, and losses.

15 **RESPONSE TO REQUEST NO. 31.**

16 In addition to the General Objections, all of which are incorporated by  
17 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
18 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
19 non-party to the Netflix Litigation, that Netflix can obtain from other sources,  
20 including Uniloc 2017. FIG also objects to this Request in that it seeks documents  
21 that are not relevant to any claims or defenses in the Netflix Litigation and is  
22 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
23 to this Request to the extent it seeks information protected by the attorney-client  
24 privilege, the attorney work-product immunity doctrine, the common interest  
25 privilege, and any other applicable privilege or protection. FIG also objects to this  
26 Request to the extent it seeks third-party documents that FIG is obligated to keep  
27 confidential.

28 On all of these grounds, FIG objects to producing, and will not produce, any

documents responsive to this Request.

**REQUEST NO. 32.**

All Documents and Communications relating to any ability by anyone at any time to grant a license, release, or covenant under any of the Uniloc Asserted Patents.

**RESPONSE TO REQUEST NO. 32.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Request as vague, ambiguous, overly broad and unduly burdensome to the extent that it seeks documents from FIG, a non-party to the Netflix Litigation, that Netflix can obtain from other sources, including Uniloc 2017. FIG also objects to this Request in that it seeks documents that are not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Request to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Request to the extent it seeks third-party documents that FIG is obligated to keep confidential. FIG objects to this Request to the extent it requires FIG to search for and produce email in contravention of the applicable ESI Order entered in the Netflix Litigation.

On all of these grounds, FIG objects to producing, and will not produce, any documents responsive to this Request.

**REQUEST NO. 33.**

All Documents and Communications concerning legal proceedings in which any of the Uniloc Asserted Patents is asserted for infringement.

**RESPONSE TO REQUEST NO. 33.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Request as vague, ambiguous, overly broad and unduly burdensome to the extent that it seeks documents from FIG, a

1 non-party to the Netflix Litigation, that Netflix can obtain from other sources,  
2 including Uniloc 2017. FIG also objects to this Request in that it seeks documents  
3 that are not relevant to any claims or defenses in the Netflix Litigation and is  
4 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
5 to this Request to the extent it seeks information protected by the attorney-client  
6 privilege, the attorney work-product immunity doctrine, the common interest  
7 privilege, and any other applicable privilege or protection. FIG also objects to this  
8 Request to the extent it seeks third-party documents that FIG is obligated to keep  
9 confidential. FIG objects to this Request to the extent it requires FIG to search for  
10 and produce email in contravention of the applicable ESI Order entered in the  
11 Netflix Litigation.

12 On all of these grounds, FIG objects to producing, and will not produce, any  
13 documents responsive to this Request.

14 **REQUEST NO. 34.**

15 All Documents including or relating to any analysis of revenue projections  
16 and return on investment of any of the Uniloc Asserted Patents or any patent  
portfolio(s) that include any of the Uniloc Asserted Patents.

17 **RESPONSE TO REQUEST NO. 34.**

18 In addition to the General Objections, all of which are incorporated by  
19 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
20 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
21 non-party to the Netflix Litigation, that Netflix can obtain from other sources,  
22 including Uniloc 2017. FIG also objects to this Request in that it seeks documents  
23 that are not relevant to any claims or defenses in the Netflix Litigation and is  
24 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
25 to this Request to the extent it seeks information protected by the attorney-client  
26 privilege, the attorney work-product immunity doctrine, the common interest  
27 privilege, and any other applicable privilege or protection. FIG also objects to this  
28 Request to the extent it seeks third-party documents that FIG is obligated to keep

1 confidential. FIG objects to this Request to the extent it requires FIG to search for  
2 and produce email in contravention of the applicable ESI Order entered in the  
3 Netflix Litigation.

4 On all of these grounds, FIG objects to producing, and will not produce, any  
5 documents responsive to this Request.

6 **REQUEST NO. 35.**

7 All Documents relating to any analysis of assertion for infringement of any  
8 of the Uniloc Asserted Patents or any patent portfolio(s) that include any of the  
9 Uniloc Asserted Patents.

9 **RESPONSE TO REQUEST NO. 35.**

10 In addition to the General Objections, all of which are incorporated by  
11 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
12 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
13 non-party to the Netflix Litigation, that Netflix can obtain from other sources,  
14 including Uniloc 2017. FIG also objects to this Request in that it seeks documents  
15 that are not relevant to any claims or defenses in the Netflix Litigation and is  
16 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
17 to this Request to the extent it seeks information protected by the attorney-client  
18 privilege, the attorney work-product immunity doctrine, the common interest  
19 privilege, and any other applicable privilege or protection. FIG also objects to this  
20 Request to the extent it seeks third-party documents that FIG is obligated to keep  
21 confidential. FIG objects to this Request to the extent it requires FIG to search for  
22 and produce email in contravention of the applicable ESI Order entered in the  
23 Netflix Litigation.

24 On all of these grounds, FIG objects to producing, and will not produce, any  
25 documents responsive to this Request.

26 **REQUEST NO. 36.**

27 All Documents relating to any financial interest You have in any settlement,  
28 judgment, damages award, or other relief that results from assertion of the Uniloc

1 Asserted Patents or any patent portfolio(s) that include any of the Uniloc Asserted  
2 Patents.

3 **RESPONSE TO REQUEST NO. 36.**

4 In addition to the General Objections, all of which are incorporated by  
5 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
6 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
7 non-party to the Netflix Litigation, that Netflix can obtain from other sources,  
8 including Uniloc 2017. FIG also objects to this Request in that it seeks documents  
9 that are not relevant to any claims or defenses in the Netflix Litigation and is  
10 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
11 to this Request to the extent it seeks information protected by the attorney-client  
12 privilege, the attorney work-product immunity doctrine, the common interest  
13 privilege, and any other applicable privilege or protection. FIG also objects to this  
14 Request to the extent it seeks third-party documents that FIG is obligated to keep  
15 confidential. FIG objects to this Request to the extent it requires FIG to search for  
16 and produce email in contravention of the applicable ESI Order entered in the  
17 Netflix Litigation.

18 On all of these grounds, FIG objects to producing, and will not produce, any  
19 documents responsive to this Request.

20 **REQUEST NO. 37.**

21 All Documents and Communications relating to Netflix's alleged  
22 infringement of any of the Uniloc Asserted Patents.

23 **RESPONSE TO REQUEST NO. 37.**

24 In addition to the General Objections, all of which are incorporated by  
25 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
26 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
27 non-party to the Netflix Litigation, that Netflix can obtain from other sources,  
28 including Uniloc 2017. FIG also objects to this Request in that it seeks documents

1 that are not relevant to any claims or defenses in the Netflix Litigation and is  
2 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
3 to this Request to the extent it seeks information protected by the attorney-client  
4 privilege, the attorney work-product immunity doctrine, the common interest  
5 privilege, and any other applicable privilege or protection. FIG also objects to this  
6 Request to the extent it seeks third-party documents that FIG is obligated to keep  
7 confidential. FIG objects to this Request to the extent it requires FIG to search for  
8 and produce email in contravention of the applicable ESI Order entered in the  
9 Netflix Litigation.

10 On all of these grounds, FIG objects to producing, and will not produce, any  
11 documents responsive to this Request.

12 **REQUEST NO. 38.**

13 All Documents and Communications relating to the decision to initiate this  
14 Litigation against Netflix.

15 **RESPONSE TO REQUEST NO. 38.**

16 In addition to the General Objections, all of which are incorporated by  
17 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
18 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
19 non-party to the Netflix Litigation, that Netflix can obtain from other sources,  
20 including Uniloc 2017. FIG also objects to this Request in that it seeks documents  
21 that are not relevant to any claims or defenses in the Netflix Litigation and is  
22 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
23 to this Request to the extent it seeks information protected by the attorney-client  
24 privilege, the attorney work-product immunity doctrine, the common interest  
25 privilege, and any other applicable privilege or protection. FIG also objects to this  
26 Request to the extent it seeks third-party documents that FIG is obligated to keep  
27 confidential. FIG objects to this Request to the extent it requires FIG to search for  
28 and produce email in contravention of the applicable ESI Order entered in the

1 Netflix Litigation.

2 On all of these grounds, FIG objects to producing, and will not produce, any  
3 documents responsive to this Request.

4 **REQUEST NO. 39.**

5 All Documents and Communications relating to any valuation of the  
6 assertion of the Uniloc Asserted Patents against Netflix.

7 **RESPONSE TO REQUEST NO. 39.**

8 In addition to the General Objections, all of which are incorporated by  
9 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
10 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
11 non-party to the Netflix Litigation, that Netflix can obtain from other sources,  
12 including Uniloc 2017. FIG also objects to this Request in that it seeks documents  
13 that are not relevant to any claims or defenses in the Netflix Litigation and is  
14 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
15 to this Request to the extent it seeks information protected by the attorney-client  
16 privilege, the attorney work-product immunity doctrine, the common interest  
17 privilege, and any other applicable privilege or protection. FIG also objects to this  
18 Request to the extent it seeks third-party documents that FIG is obligated to keep  
19 confidential. FIG objects to this Request to the extent it requires FIG to search for  
20 and produce email in contravention of the applicable ESI Order entered in the  
21 Netflix Litigation.

22 On all of these grounds, FIG objects to producing, and will not produce, any  
23 documents responsive to this Request.

24 **REQUEST NO. 40.**

25 All Documents relating to Your funding of this Litigation against Netflix.

26 **RESPONSE TO REQUEST NO. 40.**

27 In addition to the General Objections, all of which are incorporated by  
28 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
broad and unduly burdensome to the extent that it seeks documents from FIG, a

1 non-party to the Netflix Litigation, that Netflix can obtain from other sources,  
2 including Uniloc 2017. FIG objects to the phrase “funding of this Litigation” as  
3 vague and ambiguous. FIG also objects to this Request in that it seeks documents  
4 that are not relevant to any claims or defenses in the Netflix Litigation and is  
5 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
6 to this Request to the extent it seeks information protected by the attorney-client  
7 privilege, the attorney work-product immunity doctrine, the common interest  
8 privilege, and any other applicable privilege or protection. FIG also objects to this  
9 Request to the extent it seeks third-party documents that FIG is obligated to keep  
10 confidential. FIG objects to this Request to the extent it requires FIG to search for  
11 and produce email in contravention of the applicable ESI Order entered in the  
12 Netflix Litigation.

13 On all of these grounds, FIG objects to producing, and will not produce, any  
14 documents responsive to this Request.

15 **REQUEST NO. 41.**

16 All Documents relating to Your financial interest in the outcome of this  
17 Litigation against Netflix.

18 **RESPONSE TO REQUEST NO. 41.**

19 In addition to the General Objections, all of which are incorporated by  
20 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
21 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
22 non-party to the Netflix Litigation, that Netflix can obtain from other sources,  
23 including Uniloc 2017. FIG also objects to this Request in that it seeks documents  
24 that are not relevant to any claims or defenses in the Netflix Litigation and is  
25 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
26 to this Request to the extent it seeks information protected by the attorney-client  
27 privilege, the attorney work-product immunity doctrine, the common interest  
28 privilege, and any other applicable privilege or protection. FIG also objects to this

1 Request to the extent it seeks third-party documents that FIG is obligated to keep  
 2 confidential. FIG objects to this Request to the extent it requires FIG to search for  
 3 and produce email in contravention of the applicable ESI Order entered in the  
 4 Netflix Litigation.

5 On all of these grounds, FIG objects to producing, and will not produce, any  
 6 documents responsive to this Request.

7 **REQUEST NO. 42.**

8 All Documents relating to Your financial gains, profits, or revenues that may  
 9 be attributed to the '229 Patent.

10 **RESPONSE TO REQUEST NO. 42.**

11 In addition to the General Objections, all of which are incorporated by  
 12 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
 13 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
 14 non-party to the Netflix Litigation, that Netflix can obtain from other sources,  
 15 including Uniloc 2017. FIG objects to the phrase “financial gains, profits, or  
 16 revenues” as vague and ambiguous. FIG also objects to this Request in that it seeks  
 17 documents that are not relevant to any claims or defenses in the Netflix Litigation  
 18 and is therefore not proportional to the needs of the Netflix Litigation. FIG further  
 19 objects to this Request to the extent it seeks information protected by the attorney-  
 20 client privilege, the attorney work-product immunity doctrine, the common interest  
 21 privilege, and any other applicable privilege or protection. FIG also objects to this  
 22 Request to the extent it seeks third-party documents that FIG is obligated to keep  
 23 confidential. FIG objects to this Request to the extent it requires FIG to search for  
 24 and produce email in contravention of the applicable ESI Order entered in the  
 25 Netflix Litigation.

26 On all of these grounds, FIG objects to producing, and will not produce, any  
 27 documents responsive to this Request.

28 **REQUEST NO. 43.**

All Documents relating to Your financial gains, profits, or revenues that may

1 be attributed to the '609 Patent.

2 **RESPONSE TO REQUEST NO. 43.**

3 In addition to the General Objections, all of which are incorporated by  
4 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
5 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
6 non-party to the Netflix Litigation, that Netflix can obtain from other sources,  
7 including Uniloc 2017. FIG objects to the phrase “financial gains, profits, or  
8 revenues” as vague and ambiguous. FIG also objects to this Request in that it seeks  
9 documents that are not relevant to any claims or defenses in the Netflix Litigation  
10 and is therefore not proportional to the needs of the Netflix Litigation. FIG further  
11 objects to this Request to the extent it seeks information protected by the attorney-  
12 client privilege, the attorney work-product immunity doctrine, the common interest  
13 privilege, and any other applicable privilege or protection. FIG also objects to this  
14 Request to the extent it seeks third-party documents that FIG is obligated to keep  
15 confidential. FIG objects to this Request to the extent it requires FIG to search for  
16 and produce email in contravention of the applicable ESI Order entered in the  
17 Netflix Litigation.

18 On all of these grounds, FIG objects to producing, and will not produce, any  
19 documents responsive to this Request.

20 **REQUEST NO. 44.**

21 All Documents relating to Your financial gains, profits, or revenues that may  
22 be attributed to the '273 Patent.

23 **RESPONSE TO REQUEST NO. 44.**

24 In addition to the General Objections, all of which are incorporated by  
25 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
26 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
27 non-party to the Netflix Litigation, that Netflix can obtain from other sources,  
28 including Uniloc 2017. FIG objects to the phrase “financial gains, profits, or

1 revenues” as vague and ambiguous. FIG also objects to this Request in that it seeks  
2 documents that are not relevant to any claims or defenses in the Netflix Litigation  
3 and is therefore not proportional to the needs of the Netflix Litigation. FIG further  
4 objects to this Request to the extent it seeks information protected by the attorney-  
5 client privilege, the attorney work-product immunity doctrine, the common interest  
6 privilege, and any other applicable privilege or protection. FIG also objects to this  
7 Request to the extent it seeks third-party documents that FIG is obligated to keep  
8 confidential. FIG objects to this Request to the extent it requires FIG to search for  
9 and produce email in contravention of the applicable ESI Order entered in the  
10 Netflix Litigation.

11 On all of these grounds, FIG objects to producing, and will not produce, any  
12 documents responsive to this Request.

13 **REQUEST NO. 45.**

14 All Documents and Communications relating to Your offers, requests,  
15 discussion, and negotiations to provide a license to the '229 Patent.

16 **RESPONSE TO REQUEST NO. 45.**

17 In addition to the General Objections, all of which are incorporated by  
18 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
19 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
20 non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks  
21 documents that are not relevant to any claims or defenses in the Netflix Litigation  
22 and is therefore not proportional to the needs of the Netflix Litigation. FIG further  
23 objects to this Request to the extent it seeks information protected by the attorney-  
24 client privilege, the attorney work-product immunity doctrine, the common interest  
25 privilege, and any other applicable privilege or protection. FIG also objects to this  
26 Request to the extent it seeks third-party documents that FIG is obligated to keep  
27 confidential. FIG objects to this Request to the extent it requires FIG to search for  
28 and produce email in contravention of the applicable ESI Order entered in the

1 Netflix Litigation.

2 On all of these grounds, FIG objects to producing, and will not produce, any  
3 documents responsive to this Request.

4 **REQUEST NO. 46.**

5 All Documents and Communications relating to Your offers, requests,  
6 discussion, and negotiations to provide a license to the '609 Patent.

7 **RESPONSE TO REQUEST NO. 46.**

8 In addition to the General Objections, all of which are incorporated by  
9 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
10 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
11 non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks  
12 documents that are not relevant to any claims or defenses in the Netflix Litigation  
13 and is therefore not proportional to the needs of the Netflix Litigation. FIG further  
14 objects to this Request to the extent it seeks information protected by the attorney-  
15 client privilege, the attorney work-product immunity doctrine, the common interest  
16 privilege, and any other applicable privilege or protection. FIG also objects to this  
17 Request to the extent it seeks third-party documents that FIG is obligated to keep  
18 confidential. FIG objects to this Request to the extent it requires FIG to search for  
19 and produce email in contravention of the applicable ESI Order entered in the  
20 Netflix Litigation.

21 On all of these grounds, FIG objects to producing, and will not produce, any  
22 documents responsive to this Request.

23 **REQUEST NO. 47.**

24 All Documents and Communications relating to Your offers, requests,  
25 discussion, and negotiations to provide a license to the '273 Patent.

26 **RESPONSE TO REQUEST NO. 47.**

27 In addition to the General Objections, all of which are incorporated by  
28 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
broad and unduly burdensome to the extent that it seeks documents from FIG, a

1 non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks  
2 documents that are not relevant to any claims or defenses in the Netflix Litigation  
3 and is therefore not proportional to the needs of the Netflix Litigation. FIG further  
4 objects to this Request to the extent it seeks information protected by the attorney-  
5 client privilege, the attorney work-product immunity doctrine, the common interest  
6 privilege, and any other applicable privilege or protection. FIG also objects to this  
7 Request to the extent it seeks third-party documents that FIG is obligated to keep  
8 confidential. FIG objects to this Request to the extent it requires FIG to search for  
9 and produce email in contravention of the applicable ESI Order entered in the  
10 Netflix Litigation.

11 On all of these grounds, FIG objects to producing, and will not produce, any  
12 documents responsive to this Request.

13 **REQUEST NO. 48.**

14 All Documents and Communications referenced in the May 3, 2018 Payoff  
15 and Termination Agreement (produced at UNILOC\_0004017).

16 **RESPONSE TO REQUEST NO. 48.**

17 In addition to the General Objections, all of which are incorporated by  
18 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
19 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
20 non-party to the Netflix Litigation, that Netflix can obtain from other sources,  
21 including Uniloc 2017. FIG also objects to this Request in that it seeks documents  
22 that are not relevant to any claims or defenses in the Netflix Litigation and is  
23 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
24 to this Request to the extent it seeks information protected by the attorney-client  
25 privilege, the attorney work-product immunity doctrine, the common interest  
26 privilege, and any other applicable privilege or protection. FIG also objects to this  
27 Request to the extent it seeks third-party documents that FIG is obligated to keep  
28 confidential. FIG objects to this Request to the extent it requires FIG to search for

1 and produce email in contravention of the applicable ESI Order entered in the  
2 Netflix Litigation.

3 On all of these grounds, FIG objects to producing, and will not produce, any  
4 documents responsive to this Request.

5 **REQUEST NO. 49.**

6 All Documents and Communications addressing or relating to the relative  
7 value of any of the Uniloc Asserted Patents in relation to other patents, including  
8 but not limited to relative value of any of the Uniloc Asserted Patents compared to  
9 other patents that were acquired as part of the same portfolio or other patents  
10 licensed as part of the same portfolio.

11 **RESPONSE TO REQUEST NO. 49.**

12 In addition to the General Objections, all of which are incorporated by  
13 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
14 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
15 non-party to the Netflix Litigation, that Netflix can obtain from other sources,  
16 including Uniloc 2017. FIG also objects to this Request in that it seeks documents  
17 that are not relevant to any claims or defenses in the Netflix Litigation and is  
18 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
19 to this Request to the extent it seeks information protected by the attorney-client  
20 privilege, the attorney work-product immunity doctrine, the common interest  
21 privilege, and any other applicable privilege or protection. FIG also objects to this  
22 Request to the extent it seeks third-party documents that FIG is obligated to keep  
23 confidential. FIG objects to this Request to the extent it requires FIG to search for  
24 and produce email in contravention of the applicable ESI Order entered in the  
25 Netflix Litigation.

26 On all of these grounds, FIG objects to producing, and will not produce, any  
27 documents responsive to this Request.

28 **REQUEST NO. 50.**

Any business plan that references this Litigation.

**RESPONSE TO REQUEST NO. 50.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Request as vague, ambiguous, overly broad and unduly burdensome to the extent that it seeks documents from FIG, a non-party to the Netflix Litigation, that Netflix can obtain from other sources, including Uniloc 2017. FIG also objects to this Request in that it seeks documents that are not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Request to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Request to the extent it seeks third-party documents that FIG is obligated to keep confidential.

On all of these grounds, FIG objects to producing, and will not produce, any documents responsive to this Request.

**REQUEST NO. 51.**

Any business plan that references Netflix.

**RESPONSE TO REQUEST NO. 51.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Request as vague, ambiguous, overly broad and unduly burdensome to the extent that it seeks documents from FIG, a non-party to the Netflix Litigation, that Netflix can obtain from other sources, including Uniloc 2017. FIG also objects to this Request in that it seeks documents that are not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Request to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this

1 Request to the extent it seeks third-party documents that FIG is obligated to keep  
2 confidential.

3 On all of these grounds, FIG objects to producing, and will not produce, any  
4 documents responsive to this Request.

5 **REQUEST NO. 52.**

6 Any business plan that references the Uniloc Asserted Patents.

7 **RESPONSE TO REQUEST NO. 52.**

8 In addition to the General Objections, all of which are incorporated by  
9 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
10 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
11 non-party to the Netflix Litigation, that Netflix can obtain from other sources,  
12 including Uniloc 2017. FIG also objects to this Request in that it seeks documents  
13 that are not relevant to any claims or defenses in the Netflix Litigation and is  
14 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
15 to this Request to the extent it seeks information protected by the attorney-client  
16 privilege, the attorney work-product immunity doctrine, the common interest  
17 privilege, and any other applicable privilege or protection. FIG also objects to this  
18 Request to the extent it seeks third-party documents that FIG is obligated to keep  
19 confidential.

20 On all of these grounds, FIG objects to producing, and will not produce, any  
21 documents responsive to this Request.

22 **REQUEST NO. 53.**

23 Any business plan that references the Pendrell Portfolio or any of the assets  
24 therein.

25 **RESPONSE TO REQUEST NO. 53.**

26 In addition to the General Objections, all of which are incorporated by  
27 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
28 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks

1 documents that are not relevant to any claims or defenses in the Netflix Litigation  
2 and is therefore not proportional to the needs of the Netflix Litigation. FIG further  
3 objects to this Request to the extent it seeks information protected by the attorney-  
4 client privilege, the attorney work-product immunity doctrine, the common interest  
5 privilege, and any other applicable privilege or protection. FIG also objects to this  
6 Request to the extent it seeks third-party documents that FIG is obligated to keep  
7 confidential.

8 On all of these grounds, FIG objects to producing, and will not produce, any  
9 documents responsive to this Request.

10 **REQUEST NO. 54.**

11 Any business plan that references the LINQware Portfolio or any of the  
12 assets therein.

13 **RESPONSE TO REQUEST NO. 54.**

14 In addition to the General Objections, all of which are incorporated by  
15 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
16 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
17 non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks  
18 documents that are not relevant to any claims or defenses in the Netflix Litigation  
19 and is therefore not proportional to the needs of the Netflix Litigation. FIG further  
20 objects to this Request to the extent it seeks information protected by the attorney-  
21 client privilege, the attorney work-product immunity doctrine, the common interest  
22 privilege, and any other applicable privilege or protection. FIG also objects to this  
23 Request to the extent it seeks third-party documents that FIG is obligated to keep  
24 confidential.

25 On all of these grounds, FIG objects to producing, and will not produce, any  
26 documents responsive to this Request.

27 **REQUEST NO. 55.**

28 Any communication to investors that references this Litigation.

**RESPONSE TO REQUEST NO. 55.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Request as vague, ambiguous, overly broad and unduly burdensome to the extent that it seeks documents from FIG, a non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks documents that are not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Request to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Request to the extent it seeks third-party documents that FIG is obligated to keep confidential. FIG objects to this Request to the extent it requires FIG to search for and produce email in contravention of the applicable ESI Order entered in the Netflix Litigation.

On all of these grounds, FIG objects to producing, and will not produce, any documents responsive to this Request.

**REQUEST NO. 56.**

Any communication to investors that references Netflix.

**RESPONSE TO REQUEST NO. 56.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Request as vague, ambiguous, overly broad and unduly burdensome to the extent that it seeks documents from FIG, a non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks documents that are not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Request to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this

1 Request to the extent it seeks third-party documents that FIG is obligated to keep  
2 confidential. FIG objects to this Request to the extent it requires FIG to search for  
3 and produce email in contravention of the applicable ESI Order entered in the  
4 Netflix Litigation.

5 On all of these grounds, FIG objects to producing, and will not produce, any  
6 documents responsive to this Request.

7 **REQUEST NO. 57.**

8 Any communication to investors that references the Uniloc Asserted Patents.

9 **RESPONSE TO REQUEST NO. 57.**

10 In addition to the General Objections, all of which are incorporated by  
11 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
12 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
13 non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks  
14 documents that are not relevant to any claims or defenses in the Netflix Litigation  
15 and is therefore not proportional to the needs of the Netflix Litigation. FIG further  
16 objects to this Request to the extent it seeks information protected by the attorney-  
17 client privilege, the attorney work-product immunity doctrine, the common interest  
18 privilege, and any other applicable privilege or protection. FIG also objects to this  
19 Request to the extent it seeks third-party documents that FIG is obligated to keep  
20 confidential. FIG objects to this Request to the extent it requires FIG to search for  
21 and produce email in contravention of the applicable ESI Order entered in the  
22 Netflix Litigation.

23 On all of these grounds, FIG objects to producing, and will not produce, any  
24 documents responsive to this Request.

25 **REQUEST NO. 58.**

26 Any communication to investors that references the Pendrell Portfolio or any  
27 of the assets therein.

28 **RESPONSE TO REQUEST NO. 58.**

In addition to the General Objections, all of which are incorporated by

specific reference herein, FIG objects to this Request as vague, ambiguous, overly broad and unduly burdensome to the extent that it seeks documents from FIG, a non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks documents that are not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Request to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Request to the extent it seeks third-party documents that FIG is obligated to keep confidential. FIG objects to this Request to the extent it requires FIG to search for and produce email in contravention of the applicable ESI Order entered in the Netflix Litigation.

On all of these grounds, FIG objects to producing, and will not produce, any documents responsive to this Request.

**REQUEST NO. 59.**

Any communication to investors that references the LINQware Portfolio or any of the assets therein.

**RESPONSE TO REQUEST NO. 59.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Request as vague, ambiguous, overly broad and unduly burdensome to the extent that it seeks documents from FIG, a non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks documents that are not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Request to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Request to the extent it seeks third-party documents that FIG is obligated to keep

1 confidential. FIG objects to this Request to the extent it requires FIG to search for  
2 and produce email in contravention of the applicable ESI Order entered in the  
3 Netflix Litigation.

4 On all of these grounds, FIG objects to producing, and will not produce, any  
5 documents responsive to this Request.

6 **REQUEST NO. 60.**

7 Any communication with or report to Softbank Corp. regarding this  
8 Litigation.

9 **RESPONSE TO REQUEST NO. 60.**

10 In addition to the General Objections, all of which are incorporated by  
11 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
12 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
13 non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks  
14 documents that are not relevant to any claims or defenses in the Netflix Litigation  
15 and is therefore not proportional to the needs of the Netflix Litigation. FIG further  
16 objects to this Request to the extent it seeks information protected by the attorney-  
17 client privilege, the attorney work-product immunity doctrine, the common interest  
18 privilege, and any other applicable privilege or protection. FIG also objects to this  
19 Request to the extent it seeks third-party documents that FIG is obligated to keep  
20 confidential. FIG objects to this Request to the extent it requires FIG to search for  
21 and produce email in contravention of the applicable ESI Order entered in the  
22 Netflix Litigation.

23 On all of these grounds, FIG objects to producing, and will not produce, any  
24 documents responsive to this Request.

25 **REQUEST NO. 61.**

26 Any communication with or report to Softbank Corp. regarding Netflix.

27 **RESPONSE TO REQUEST NO. 61.**

28 In addition to the General Objections, all of which are incorporated by  
specific reference herein, FIG objects to this Request as vague, ambiguous, overly

1 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
2 non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks  
3 documents that are not relevant to any claims or defenses in the Netflix Litigation  
4 and is therefore not proportional to the needs of the Netflix Litigation. FIG further  
5 objects to this Request to the extent it seeks information protected by the attorney-  
6 client privilege, the attorney work-product immunity doctrine, the common interest  
7 privilege, and any other applicable privilege or protection. FIG also objects to this  
8 Request to the extent it seeks third-party documents that FIG is obligated to keep  
9 confidential. FIG objects to this Request to the extent it requires FIG to search for  
10 and produce email in contravention of the applicable ESI Order entered in the  
11 Netflix Litigation.

12 On all of these grounds, FIG objects to producing, and will not produce, any  
13 documents responsive to this Request.

14 **REQUEST NO. 62.**

15 Any communication with or report to Softbank Corp. regarding the Uniloc  
16 Asserted Patents.

17 **RESPONSE TO REQUEST NO. 62.**

18 In addition to the General Objections, all of which are incorporated by  
19 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
20 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
21 non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks  
22 documents that are not relevant to any claims or defenses in the Netflix Litigation  
23 and is therefore not proportional to the needs of the Netflix Litigation. FIG further  
24 objects to this Request to the extent it seeks information protected by the attorney-  
25 client privilege, the attorney work-product immunity doctrine, the common interest  
26 privilege, and any other applicable privilege or protection. FIG also objects to this  
27 Request to the extent it seeks third-party documents that FIG is obligated to keep  
28 confidential. FIG objects to this Request to the extent it requires FIG to search for

1 and produce email in contravention of the applicable ESI Order entered in the  
2 Netflix Litigation.

3 On all of these grounds, FIG objects to producing, and will not produce, any  
4 documents responsive to this Request.

5 **REQUEST NO. 63.**

6 Any communication with or report to Softbank Corp. regarding the Pendrell  
7 Portfolio or any of the assets therein.

8 **RESPONSE TO REQUEST NO. 63.**

9 In addition to the General Objections, all of which are incorporated by  
10 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
11 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
12 non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks  
13 documents that are not relevant to any claims or defenses in the Netflix Litigation  
14 and is therefore not proportional to the needs of the Netflix Litigation. FIG further  
15 objects to this Request to the extent it seeks information protected by the attorney-  
16 client privilege, the attorney work-product immunity doctrine, the common interest  
17 privilege, and any other applicable privilege or protection. FIG also objects to this  
18 Request to the extent it seeks third-party documents that FIG is obligated to keep  
19 confidential. FIG objects to this Request to the extent it requires FIG to search for  
20 and produce email in contravention of the applicable ESI Order entered in the  
21 Netflix Litigation.

22 On all of these grounds, FIG objects to producing, and will not produce, any  
23 documents responsive to this Request.

24 **REQUEST NO. 64.**

25 Any communication with or report to Softbank Corp. regarding the  
26 LINQware Portfolio or any of the assets therein.

27 **RESPONSE TO REQUEST NO. 64.**

28 In addition to the General Objections, all of which are incorporated by  
specific reference herein, FIG objects to this Request as vague, ambiguous, overly

1 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
2 non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks  
3 documents that are not relevant to any claims or defenses in the Netflix Litigation  
4 and is therefore not proportional to the needs of the Netflix Litigation. FIG further  
5 objects to this Request to the extent it seeks information protected by the attorney-  
6 client privilege, the attorney work-product immunity doctrine, the common interest  
7 privilege, and any other applicable privilege or protection. FIG also objects to this  
8 Request to the extent it seeks third-party documents that FIG is obligated to keep  
9 confidential. FIG objects to this Request to the extent it requires FIG to search for  
10 and produce email in contravention of the applicable ESI Order entered in the  
11 Netflix Litigation.

12 On all of these grounds, FIG objects to producing, and will not produce, any  
13 documents responsive to this Request.

14 **REQUEST NO. 65.**

15 Any forecasts and/or outlook on any possible results related to this Litigation,  
16 Netflix, the Uniloc Asserted Patents, the Pendrell Portfolio or any of the assets  
therein, and/or LINQware Portfolio or any of the assets therein.

17 **RESPONSE TO REQUEST NO. 65.**

18 In addition to the General Objections, all of which are incorporated by  
19 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
20 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
21 non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks  
22 documents that are not relevant to any claims or defenses in the Netflix Litigation  
23 and is therefore not proportional to the needs of the Netflix Litigation. FIG further  
24 objects to this Request to the extent it seeks information protected by the attorney-  
25 client privilege, the attorney work-product immunity doctrine, the common interest  
26 privilege, and any other applicable privilege or protection. FIG also objects to this  
27 Request to the extent it seeks third-party documents that FIG is obligated to keep  
28 confidential. FIG objects to this Request to the extent it requires FIG to search for

1 and produce email in contravention of the applicable ESI Order entered in the  
2 Netflix Litigation.

3 On all of these grounds, FIG objects to producing, and will not produce, any  
4 documents responsive to this Request.

5 **REQUEST NO. 66.**

6 All Documents and Communications relating to patent assertion strategy  
7 involving any of the Uniloc Asserted Patents or any patent portfolio(s) that include  
8 any of the Uniloc Asserted Patents.

8 **RESPONSE TO REQUEST NO. 66.**

9 In addition to the General Objections, all of which are incorporated by  
10 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
11 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
12 non-party to the Netflix Litigation, that Netflix can obtain from other sources,  
13 including Uniloc 2017. FIG also objects to this Request in that it seeks documents  
14 that are not relevant to any claims or defenses in the Netflix Litigation and is  
15 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
16 to this Request to the extent it seeks information protected by the attorney-client  
17 privilege, the attorney work-product immunity doctrine, the common interest  
18 privilege, and any other applicable privilege or protection. FIG also objects to this  
19 Request to the extent it seeks third-party documents that FIG is obligated to keep  
20 confidential. FIG objects to this Request to the extent it requires FIG to search for  
21 and produce email in contravention of the applicable ESI Order entered in the  
22 Netflix Litigation.

23 On all of these grounds, FIG objects to producing, and will not produce, any  
24 documents responsive to this Request.

25 **REQUEST NO. 67.**

26 All Documents and Communications relating to Softbank Corp.'s decision to  
27 invest in You, including but not limited to any valuation conducted by Softbank  
28 Corp. of the Uniloc Asserted Patents or any patent portfolio(s) that include any of  
the Uniloc Asserted Patents.

**RESPONSE TO REQUEST NO. 67.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Request as vague, ambiguous, overly broad and unduly burdensome to the extent that it seeks documents from FIG, a non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks documents that are not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Request to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Request to the extent it seeks third-party documents that FIG is obligated to keep confidential. FIG objects to this Request to the extent it requires FIG to search for and produce email in contravention of the applicable ESI Order entered in the Netflix Litigation.

On all of these grounds, FIG objects to producing, and will not produce, any documents responsive to this Request.

**REQUEST NO. 68.**

All Documents and Communications relating to any agreement involving Your investment in or ownership of any patent assertion entity and the reasons for any subsequent change or modification in the terms of any such agreement.

**RESPONSE TO REQUEST NO. 68.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Request as vague, ambiguous, overly broad and unduly burdensome to the extent that it seeks documents from FIG, a non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks documents that are not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Request to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest

1 privilege, and any other applicable privilege or protection. FIG also objects to this  
2 Request to the extent it seeks third-party documents that FIG is obligated to keep  
3 confidential. FIG objects to this Request to the extent it requires FIG to search for  
4 and produce email in contravention of the applicable ESI Order entered in the  
5 Netflix Litigation.

6 On all of these grounds, FIG objects to producing, and will not produce, any  
7 documents responsive to this Request.

8 **REQUEST NO. 69.**

9 All Documents and Communications relating to Your strategy to drive up the  
10 costs of defense in any patent assertion campaigns in which You are a party.

11 **RESPONSE TO REQUEST NO. 69.**

12 In addition to the General Objections, all of which are incorporated by  
13 specific reference herein, FIG objects to this Request as vague, ambiguous, overly  
14 broad and unduly burdensome to the extent that it seeks documents from FIG, a  
15 non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks  
16 documents that are not relevant to any claims or defenses in the Netflix Litigation  
17 and is therefore not proportional to the needs of the Netflix Litigation. FIG further  
18 objects to this Request to the extent it seeks information protected by the attorney-  
19 client privilege, the attorney work-product immunity doctrine, the common interest  
20 privilege, and any other applicable privilege or protection. FIG also objects to this  
21 Request to the extent it seeks third-party documents that FIG is obligated to keep  
22 confidential. FIG objects to this Request to the extent it requires FIG to search for  
23 and produce email in contravention of the applicable ESI Order entered in the  
24 Netflix Litigation.

25 On all of these grounds, FIG objects to producing, and will not produce, any  
26 documents responsive to this Request.

27 **REQUEST NO. 70.**

28 All Documents and Communications relating to the amount of control  
exercised by You in Uniloc 2017 and/or Uniloc.

**RESPONSE TO REQUEST NO. 70.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Request as vague, ambiguous, overly broad and unduly burdensome to the extent that it seeks documents from FIG, a non-party to the Netflix Litigation, that Netflix can obtain from other sources, including Uniloc 2017. FIG also objects to this Request in that it seeks documents that are not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Request to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Request to the extent it seeks third-party documents that FIG is obligated to keep confidential. FIG objects to this Request to the extent it requires FIG to search for and produce email in contravention of the applicable ESI Order entered in the Netflix Litigation.

On all of these grounds, FIG objects to producing, and will not produce, any documents responsive to this Request.

**OBJECTIONS TO DEPOSITION TOPICS****TOPIC NO. 1.**

Your current and former composition, ownership, corporate structure and operation, including without limitation, facts concerning Your creation, funding, and operation; an identification of Your present members, managers, officers, employees, and agents; and the positions, titles, and interests of any identified individuals.

**RESPONSE TO TOPIC NO. 1.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Topic as vague, ambiguous, overly broad and unduly burdensome in that it requests information from FIG, a non-party to the Netflix Litigation. FIG also objects to this Topic in that it seeks information

1 that is not relevant to any claims or defenses in the Netflix Litigation and is  
2 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
3 to this Topic to the extent it seeks information protected by the attorney-client  
4 privilege, the attorney work-product immunity doctrine, the common interest  
5 privilege, and any other applicable privilege or protection. FIG also objects to this  
6 Topic to the extent it seeks third-party information that FIG is obligated to keep  
7 confidential.

8 On all of these grounds, FIG objects to producing, and will not produce, any  
9 witnesses to testify regarding this Topic.

10 **TOPIC NO. 2.**

11 Uniloc 2017's current and former composition, ownership, corporate  
12 structure and operation, including without limitation, facts concerning Uniloc  
13 2017's formation, creation, funding, and operation; an identification of Uniloc  
14 2017's present members, managers, officers, employees, and agents; and the  
15 positions, titles, and interests of any identified individuals.

16 **RESPONSE TO TOPIC NO. 2.**

17 In addition to the General Objections, all of which are incorporated by  
18 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
19 broad and unduly burdensome in that it requests information from FIG, a non-party  
20 to the Netflix Litigation, that Netflix can obtain from other sources, including  
21 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not  
22 relevant to any claims or defenses in the Netflix Litigation and is therefore not  
23 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic  
24 to the extent it seeks information protected by the attorney-client privilege, the  
25 attorney work-product immunity doctrine, the common interest privilege, and any  
26 other applicable privilege or protection. FIG also objects to this Topic to the extent  
27 it seeks third-party information that FIG is obligated to keep confidential.

28 On all of these grounds, FIG objects to producing, and will not produce, any  
witnesses to testify regarding this Topic.

**TOPIC NO. 3.**

The business relationship between You and Uniloc, including the date the relationship began and the scope of the relationship.

**RESPONSE TO TOPIC NO. 3.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Topic as vague, ambiguous, overly broad and unduly burdensome in that it requests information from FIG, a non-party to the Netflix Litigation, that Netflix can obtain from other sources, including Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Topic to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Topic to the extent it seeks third-party information that FIG is obligated to keep confidential.

On all of these grounds, FIG objects to producing, and will not produce, any witnesses to testify regarding this Topic.

**TOPIC NO. 4.**

Agreements entered into between You and Uniloc.

**RESPONSE TO TOPIC NO. 4.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Topic as vague, ambiguous, overly broad and unduly burdensome in that it requests information from FIG, a non-party to the Netflix Litigation, that Netflix can obtain from other sources, including Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Topic to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any

1 other applicable privilege or protection. FIG also objects to this Topic to the extent  
 2 it seeks third-party information that FIG is obligated to keep confidential.

3 On all of these grounds, FIG objects to producing, and will not produce, any  
 4 witnesses to testify regarding this Topic.

5 **TOPIC NO. 5.**

6 The business relationship between You and Uniloc 2017, including the date  
 7 the relationship began and the scope of the relationship.

8 **RESPONSE TO TOPIC NO. 5.**

9 In addition to the General Objections, all of which are incorporated by  
 10 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
 11 broad and unduly burdensome in that it requests information from FIG, a non-party  
 12 to the Netflix Litigation, that Netflix can obtain from other sources, including  
 13 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not  
 14 relevant to any claims or defenses in the Netflix Litigation and is therefore not  
 15 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic  
 16 to the extent it seeks information protected by the attorney-client privilege, the  
 17 attorney work-product immunity doctrine, the common interest privilege, and any  
 18 other applicable privilege or protection. FIG also objects to this Topic to the extent  
 19 it seeks third-party information that FIG is obligated to keep confidential.

20 On all of these grounds, FIG objects to producing, and will not produce, any  
 21 witnesses to testify regarding this Topic.

22 **TOPIC NO. 6.**

23 Agreements entered into between You and Uniloc 2017.

24 **RESPONSE TO TOPIC NO. 6.**

25 In addition to the General Objections, all of which are incorporated by  
 26 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
 27 broad and unduly burdensome in that it requests information from FIG, a non-party  
 28 to the Netflix Litigation, that Netflix can obtain from other sources, including  
 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not

1 relevant to any claims or defenses in the Netflix Litigation and is therefore not  
2 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic  
3 to the extent it seeks information protected by the attorney-client privilege, the  
4 attorney work-product immunity doctrine, the common interest privilege, and any  
5 other applicable privilege or protection. FIG also objects to this Topic to the extent  
6 it seeks third-party information that FIG is obligated to keep confidential.

7 On all of these grounds, FIG objects to producing, and will not produce, any  
8 witnesses to testify regarding this Topic.

9 **TOPIC NO. 7.**

10 Your revenues, expenses, and profits from patent asserting activities since  
11 2013.

12 **RESPONSE TO TOPIC NO. 7.**

13 In addition to the General Objections, all of which are incorporated by  
14 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
15 broad and unduly burdensome in that it requests information from FIG, a non-party  
16 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information  
17 that is not relevant to any claims or defenses in the Netflix Litigation and is  
18 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
19 to this Topic to the extent it seeks information protected by the attorney-client  
20 privilege, the attorney work-product immunity doctrine, the common interest  
21 privilege, and any other applicable privilege or protection. FIG also objects to this  
22 Topic to the extent it seeks third-party information that FIG is obligated to keep  
23 confidential.

24 On all of these grounds, FIG objects to producing, and will not produce, any  
25 witnesses to testify regarding this Topic.

26 **TOPIC NO. 8.**

27 Your policies, practices, and customs concerning patent asserting activities  
28 since 2013.

**RESPONSE TO TOPIC NO. 8.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Topic as vague, ambiguous, overly broad and unduly burdensome in that it requests information from FIG, a non-party to the Netflix Litigation. FIG also objects to this Topic in that it seeks information that is not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Topic to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Topic to the extent it seeks third-party information that FIG is obligated to keep confidential.

On all of these grounds, FIG objects to producing, and will not produce, any witnesses to testify regarding this Topic.

**TOPIC NO. 9.**

IPG Electronics 502 Limited's acquisition of patents including the '229 Patent from Electronics and Telecommunications Research Institute (ETRI).

**RESPONSE TO TOPIC NO. 9.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Topic as vague, ambiguous, overly broad and unduly burdensome in that it requests information from FIG, a non-party to the Netflix Litigation, that Netflix can obtain from other sources, including Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Topic to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Topic to the extent

1 it seeks third-party information that FIG is obligated to keep confidential.

2 On all of these grounds, FIG objects to producing, and will not produce, any  
3 witnesses to testify regarding this Topic.

4 **TOPIC NO. 10.**

5 Pendrell's acquisition of patents including the '229 Patent from IPG  
6 Electronics 502 Limited.

7 **RESPONSE TO TOPIC NO. 10.**

8 In addition to the General Objections, all of which are incorporated by  
9 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
10 broad and unduly burdensome in that it requests information from FIG, a non-party  
11 to the Netflix Litigation, that Netflix can obtain from other sources, including  
12 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not  
13 relevant to any claims or defenses in the Netflix Litigation and is therefore not  
14 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic  
15 to the extent it seeks information protected by the attorney-client privilege, the  
16 attorney work-product immunity doctrine, the common interest privilege, and any  
17 other applicable privilege or protection. FIG also objects to this Topic to the extent  
18 it seeks third-party information that FIG is obligated to keep confidential.

19 On all of these grounds, FIG objects to producing, and will not produce, any  
20 witnesses to testify regarding this Topic.

21 **TOPIC NO. 11.**

22 Uniloc's acquisition of the Pendrell Portfolio patents from Pendrell.

23 **RESPONSE TO TOPIC NO. 11.**

24 In addition to the General Objections, all of which are incorporated by  
25 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
26 broad and unduly burdensome in that it requests information from FIG, a non-party  
27 to the Netflix Litigation, that Netflix can obtain from other sources, including  
28 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not  
relevant to any claims or defenses in the Netflix Litigation and is therefore not

1 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic  
 2 to the extent it seeks information protected by the attorney-client privilege, the  
 3 attorney work-product immunity doctrine, the common interest privilege, and any  
 4 other applicable privilege or protection. FIG also objects to this Topic to the extent  
 5 it seeks third-party information that FIG is obligated to keep confidential.

6 On all of these grounds, FIG objects to producing, and will not produce, any  
 7 witnesses to testify regarding this Topic.

8 **TOPIC NO. 12.**

9 Communications with Uniloc relating to the acquisition of the Pendrell  
 10 Portfolio patents.

11 **RESPONSE TO TOPIC NO. 12.**

12 In addition to the General Objections, all of which are incorporated by  
 13 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
 14 broad and unduly burdensome in that it requests information from FIG, a non-party  
 15 to the Netflix Litigation, that Netflix can obtain from other sources, including  
 16 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not  
 17 relevant to any claims or defenses in the Netflix Litigation and is therefore not  
 18 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic  
 19 to the extent it seeks information protected by the attorney-client privilege, the  
 20 attorney work-product immunity doctrine, the common interest privilege, and any  
 21 other applicable privilege or protection. FIG also objects to this Topic to the extent  
 22 it seeks third-party information that FIG is obligated to keep confidential.

23 On all of these grounds, FIG objects to producing, and will not produce, any  
 24 witnesses to testify regarding this Topic.

25 **TOPIC NO. 13.**

26 Communications with Pendrell relating to the acquisition of the Pendrell  
 27 Portfolio patents.

28 **RESPONSE TO TOPIC NO. 13.**

In addition to the General Objections, all of which are incorporated by

specific reference herein, FIG objects to this Topic as vague, ambiguous, overly broad and unduly burdensome in that it requests information from FIG, a non-party to the Netflix Litigation, that Netflix can obtain from other sources, including Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Topic to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Topic to the extent it seeks third-party information that FIG is obligated to keep confidential.

On all of these grounds, FIG objects to producing, and will not produce, any witnesses to testify regarding this Topic.

**TOPIC NO. 14.**

Agreements and licenses between You and Uniloc concerning any rights to any of the Pendrell Portfolio patents.

**RESPONSE TO TOPIC NO. 14.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Topic as vague, ambiguous, overly broad and unduly burdensome in that it requests information from FIG, a non-party to the Netflix Litigation, that Netflix can obtain from other sources, including Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Topic to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Topic to the extent it seeks third-party information that FIG is obligated to keep confidential.

On all of these grounds, FIG objects to producing, and will not produce, any

1 witnesses to testify regarding this Topic.

2 **TOPIC NO. 15.**

3 Valuations of any of the Pendrell Portfolio patents.

4 **RESPONSE TO TOPIC NO. 15.**

5 In addition to the General Objections, all of which are incorporated by  
6 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
7 broad and unduly burdensome in that it requests information from FIG, a non-party  
8 to the Netflix Litigation, that Netflix can obtain from other sources, including  
9 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not  
10 relevant to any claims or defenses in the Netflix Litigation and is therefore not  
11 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic  
12 to the extent it seeks information protected by the attorney-client privilege, the  
13 attorney work-product immunity doctrine, the common interest privilege, and any  
14 other applicable privilege or protection. FIG also objects to this Topic to the extent  
15 it seeks third-party information that FIG is obligated to keep confidential.

16 On all of these grounds, FIG objects to producing, and will not produce, any  
17 witnesses to testify regarding this Topic.

18 **TOPIC NO. 16.**

19 Uniloc's acquisition of the LINQware Portfolio patents from LINQware.

20 **RESPONSE TO TOPIC NO. 16.**

21 In addition to the General Objections, all of which are incorporated by  
22 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
23 broad and unduly burdensome in that it requests information from FIG, a non-party  
24 to the Netflix Litigation, that Netflix can obtain from other sources, including  
25 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not  
26 relevant to any claims or defenses in the Netflix Litigation and is therefore not  
27 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic  
28 to the extent it seeks information protected by the attorney-client privilege, the

1 attorney work-product immunity doctrine, the common interest privilege, and any  
2 other applicable privilege or protection. FIG also objects to this Topic to the extent  
3 it seeks third-party information that FIG is obligated to keep confidential.

4 On all of these grounds, FIG objects to producing, and will not produce, any  
5 witnesses to testify regarding this Topic.

6 **TOPIC NO. 17.**

7 Communications with Uniloc relating to the acquisition of the LINQware  
8 Portfolio patents.

9 **RESPONSE TO TOPIC NO. 17.**

10 In addition to the General Objections, all of which are incorporated by  
11 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
12 broad and unduly burdensome in that it requests information from FIG, a non-party  
13 to the Netflix Litigation, that Netflix can obtain from other sources, including  
14 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not  
15 relevant to any claims or defenses in the Netflix Litigation and is therefore not  
16 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic  
17 to the extent it seeks information protected by the attorney-client privilege, the  
18 attorney work-product immunity doctrine, the common interest privilege, and any  
19 other applicable privilege or protection. FIG also objects to this Topic to the extent  
20 it seeks third-party information that FIG is obligated to keep confidential.

21 On all of these grounds, FIG objects to producing, and will not produce, any  
22 witnesses to testify regarding this Topic.

23 **TOPIC NO. 18.**

24 Communications with LINQware relating to the acquisition of the LINQware  
25 Portfolio patents.

26 **RESPONSE TO TOPIC NO. 18.**

27 In addition to the General Objections, all of which are incorporated by  
28 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
broad and unduly burdensome in that it requests information from FIG, a non-party

1 to the Netflix Litigation, that Netflix can obtain from other sources, including  
 2 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not  
 3 relevant to any claims or defenses in the Netflix Litigation and is therefore not  
 4 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic  
 5 to the extent it seeks information protected by the attorney-client privilege, the  
 6 attorney work-product immunity doctrine, the common interest privilege, and any  
 7 other applicable privilege or protection. FIG also objects to this Topic to the extent  
 8 it seeks third-party information that FIG is obligated to keep confidential.

9 On all of these grounds, FIG objects to producing, and will not produce, any  
 10 witnesses to testify regarding this Topic.

#### 11 **TOPIC NO. 19.**

12 Agreements and licenses between You and Uniloc concerning any rights to  
 13 any of the LINQware Portfolio patents.

#### 14 **RESPONSE TO TOPIC NO. 19.**

15 In addition to the General Objections, all of which are incorporated by  
 16 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
 17 broad and unduly burdensome in that it requests information from FIG, a non-party  
 18 to the Netflix Litigation, that Netflix can obtain from other sources, including  
 19 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not  
 20 relevant to any claims or defenses in the Netflix Litigation and is therefore not  
 21 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic  
 22 to the extent it seeks information protected by the attorney-client privilege, the  
 23 attorney work-product immunity doctrine, the common interest privilege, and any  
 24 other applicable privilege or protection. FIG also objects to this Topic to the extent  
 25 it seeks third-party information that FIG is obligated to keep confidential.

26 On all of these grounds, FIG objects to producing, and will not produce, any  
 27 witnesses to testify regarding this Topic.

#### 28 **TOPIC NO. 20.**

Valuations of any of the LINQware Portfolio patents.

**RESPONSE TO TOPIC NO. 20.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Topic as vague, ambiguous, overly broad and unduly burdensome in that it requests information from FIG, a non-party to the Netflix Litigation. FIG also objects to this Topic in that it seeks information that is not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Topic to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Topic to the extent it seeks third-party information that FIG is obligated to keep confidential.

On all of these grounds, FIG objects to producing, and will not produce, any witnesses to testify regarding this Topic.

**TOPIC NO. 21.**

Uniloc 2017's acquisition of the Uniloc Asserted Patents from Uniloc Luxembourg S.A.

**RESPONSE TO TOPIC NO. 21.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Topic as vague, ambiguous, overly broad and unduly burdensome in that it requests information from FIG, a non-party to the Netflix Litigation, that Netflix can obtain from other sources, including Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Topic to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Topic to the extent

1 it seeks third-party information that FIG is obligated to keep confidential.

2 On all of these grounds, FIG objects to producing, and will not produce, any  
3 witnesses to testify regarding this Topic.

4 **TOPIC NO. 22.**

5 Valuations of any of the Uniloc Asserted Patents or any patent portfolio(s)  
6 that include any of the Uniloc Asserted Patents.

7 **RESPONSE TO TOPIC NO. 22.**

8 In addition to the General Objections, all of which are incorporated by  
9 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
10 broad and unduly burdensome in that it requests information from FIG, a non-party  
11 to the Netflix Litigation, that Netflix can obtain from other sources, including  
12 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not  
13 relevant to any claims or defenses in the Netflix Litigation and is therefore not  
14 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic  
15 to the extent it seeks information protected by the attorney-client privilege, the  
16 attorney work-product immunity doctrine, the common interest privilege, and any  
17 other applicable privilege or protection. FIG also objects to this Topic to the extent  
18 it seeks third-party information that FIG is obligated to keep confidential.

19 On all of these grounds, FIG objects to producing, and will not produce, any  
20 witnesses to testify regarding this Topic.

21 **TOPIC NO. 23.**

22 Valuations of any of the Uniloc Asserted Patents or any patent portfolio(s)  
23 that include any of the Uniloc Asserted Patents compared with Your entire patent  
24 portfolio.

25 **RESPONSE TO TOPIC NO. 23.**

26 In addition to the General Objections, all of which are incorporated by  
27 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
28 broad and unduly burdensome in that it requests information from FIG, a non-party  
to the Netflix Litigation, that Netflix can obtain from other sources, including

Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Topic to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Topic to the extent it seeks third-party information that FIG is obligated to keep confidential.

On all of these grounds, FIG objects to producing, and will not produce, any witnesses to testify regarding this Topic.

**TOPIC NO. 24.**

License agreements conferring any rights to any of the Uniloc Asserted Patents or any patent portfolio(s) that include any of the Uniloc Asserted Patents, including licenses entered into by You, Uniloc, Uniloc 2017, or any prior assignee.

**RESPONSE TO TOPIC NO. 24.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Topic as vague, ambiguous, overly broad and unduly burdensome in that it requests information from FIG, a non-party to the Netflix Litigation, that Netflix can obtain from other sources, including Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Topic to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Topic to the extent it seeks third-party information that FIG is obligated to keep confidential.

On all of these grounds, FIG objects to producing, and will not produce, any witnesses to testify regarding this Topic.

**TOPIC NO. 25.**

Agreements conferring any financial, ownership, or security interests to any

1 of the Uniloc Asserted Patents or any patent portfolio(s) that include any of the  
2 Uniloc Asserted Patents.

3 **RESPONSE TO TOPIC NO. 25.**

4 In addition to the General Objections, all of which are incorporated by  
5 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
6 broad and unduly burdensome in that it requests information from FIG, a non-party  
7 to the Netflix Litigation, that Netflix can obtain from other sources, including  
8 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not  
9 relevant to any claims or defenses in the Netflix Litigation and is therefore not  
10 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic  
11 to the extent it seeks information protected by the attorney-client privilege, the  
12 attorney work-product immunity doctrine, the common interest privilege, and any  
13 other applicable privilege or protection. FIG also objects to this Topic to the extent  
14 it seeks third-party information that FIG is obligated to keep confidential.

15 On all of these grounds, FIG objects to producing, and will not produce, any  
16 witnesses to testify regarding this Topic.

17 **TOPIC NO. 26.**

18 Communications regarding any of the Uniloc Asserted Patents involving  
19 You, Uniloc 2017, Uniloc, Pendrell, or LINQware.

20 **RESPONSE TO TOPIC NO. 26.**

21 In addition to the General Objections, all of which are incorporated by  
22 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
23 broad and unduly burdensome in that it requests information from FIG, a non-party  
24 to the Netflix Litigation, that Netflix can obtain from other sources, including  
25 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not  
26 relevant to any claims or defenses in the Netflix Litigation and is therefore not  
27 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic  
28 to the extent it seeks information protected by the attorney-client privilege, the

1 attorney work-product immunity doctrine, the common interest privilege, and any  
 2 other applicable privilege or protection. FIG also objects to this Topic to the extent  
 3 it seeks third-party information that FIG is obligated to keep confidential.

4 On all of these grounds, FIG objects to producing, and will not produce, any  
 5 witnesses to testify regarding this Topic.

6 **TOPIC NO. 27.**

7 Communications regarding any of the Uniloc Asserted Patents involving any  
 8 person or entity accused of infringing any of the Uniloc Asserted Patents.

9 **RESPONSE TO TOPIC NO. 27.**

10 In addition to the General Objections, all of which are incorporated by  
 11 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
 12 broad and unduly burdensome in that it requests information from FIG, a non-party  
 13 to the Netflix Litigation, that Netflix can obtain from other sources, including  
 14 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not  
 15 relevant to any claims or defenses in the Netflix Litigation and is therefore not  
 16 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic  
 17 to the extent it seeks information protected by the attorney-client privilege, the  
 18 attorney work-product immunity doctrine, the common interest privilege, and any  
 19 other applicable privilege or protection. FIG also objects to this Topic to the extent  
 20 it seeks third-party information that FIG is obligated to keep confidential.

21 On all of these grounds, FIG objects to producing, and will not produce, any  
 22 witnesses to testify regarding this Topic.

23 **TOPIC NO. 28.**

24 Communications regarding any of the Uniloc Asserted Patents and Netflix.

25 **RESPONSE TO TOPIC NO. 28.**

26 In addition to the General Objections, all of which are incorporated by  
 27 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
 28 broad and unduly burdensome in that it requests information from FIG, a non-party  
 to the Netflix Litigation, that Netflix can obtain from other sources, including

1 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not  
2 relevant to any claims or defenses in the Netflix Litigation and is therefore not  
3 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic  
4 to the extent it seeks information protected by the attorney-client privilege, the  
5 attorney work-product immunity doctrine, the common interest privilege, and any  
6 other applicable privilege or protection. FIG also objects to this Topic to the extent  
7 it seeks third-party information that FIG is obligated to keep confidential.

8 On all of these grounds, FIG objects to producing, and will not produce, any  
9 witnesses to testify regarding this Topic.

10 **TOPIC NO. 29.**

11 Your and Uniloc 2017's financial condition between 2013 and the present  
12 including but not limited to Your and Uniloc 2017's revenues, profits, and losses.

13 **RESPONSE TO TOPIC NO. 29.**

14 In addition to the General Objections, all of which are incorporated by  
15 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
16 broad and unduly burdensome in that it requests information from FIG, a non-party  
17 to the Netflix Litigation, that Netflix can obtain from other sources, including  
18 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not  
19 relevant to any claims or defenses in the Netflix Litigation and is therefore not  
20 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic  
21 to the extent it seeks information protected by the attorney-client privilege, the  
22 attorney work-product immunity doctrine, the common interest privilege, and any  
23 other applicable privilege or protection. FIG also objects to this Topic to the extent  
24 it seeks third-party information that FIG is obligated to keep confidential.

25 On all of these grounds, FIG objects to producing, and will not produce, any  
26 witnesses to testify regarding this Topic.

27 **TOPIC NO. 30.**

28 Any ability by anyone at any time to grant a license, release, or covenant  
under any of the Uniloc Asserted Patents.

**RESPONSE TO TOPIC NO. 30.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Topic as vague, ambiguous, overly broad and unduly burdensome in that it requests information from FIG, a non-party to the Netflix Litigation, that Netflix can obtain from other sources, including Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Topic to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Topic to the extent it seeks third-party information that FIG is obligated to keep confidential.

On all of these grounds, FIG objects to producing, and will not produce, any witnesses to testify regarding this Topic.

**TOPIC NO. 31.**

Legal proceedings in which any of the Uniloc Asserted Patents is asserted for infringement.

**RESPONSE TO TOPIC NO. 31.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Topic as vague, ambiguous, overly broad and unduly burdensome in that it requests information from FIG, a non-party to the Netflix Litigation, that Netflix can obtain from other sources, including Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Topic to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Topic to the extent

1 it seeks third-party information that FIG is obligated to keep confidential.

2 On all of these grounds, FIG objects to producing, and will not produce, any  
3 witnesses to testify regarding this Topic.

4 **TOPIC NO. 32.**

5 Analysis of revenue projections and return on investment of any of the  
6 Uniloc Asserted Patents or any patent portfolio(s) that include any of the Uniloc  
7 Asserted Patents.

8 **RESPONSE TO TOPIC NO. 32.**

9 In addition to the General Objections, all of which are incorporated by  
10 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
11 broad and unduly burdensome in that it requests information from FIG, a non-party  
12 to the Netflix Litigation, that Netflix can obtain from other sources, including  
13 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not  
14 relevant to any claims or defenses in the Netflix Litigation and is therefore not  
15 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic  
16 to the extent it seeks information protected by the attorney-client privilege, the  
17 attorney work-product immunity doctrine, the common interest privilege, and any  
18 other applicable privilege or protection. FIG also objects to this Topic to the extent  
19 it seeks third-party information that FIG is obligated to keep confidential.

20 On all of these grounds, FIG objects to producing, and will not produce, any  
21 witnesses to testify regarding this Topic.

22 **TOPIC NO. 33.**

23 Analysis of assertion for infringement of any of the Uniloc Asserted Patents  
24 or any patent portfolio(s) that include any of the Uniloc Asserted Patents.

25 **RESPONSE TO TOPIC NO. 33.**

26 In addition to the General Objections, all of which are incorporated by  
27 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
28 broad and unduly burdensome in that it requests information from FIG, a non-party  
to the Netflix Litigation, that Netflix can obtain from other sources, including

Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Topic to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Topic to the extent it seeks third-party information that FIG is obligated to keep confidential.

On all of these grounds, FIG objects to producing, and will not produce, any witnesses to testify regarding this Topic.

**TOPIC NO. 34.**

Financial interest You have in any settlement, judgment, damages award, or other relief that results from assertion of the Uniloc Asserted Patents or any patent portfolio(s) that include any of the Uniloc Asserted Patents.

**RESPONSE TO TOPIC NO. 34.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Topic as vague, ambiguous, overly broad and unduly burdensome in that it requests information from FIG, a non-party to the Netflix Litigation, that Netflix can obtain from other sources, including Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Topic to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Topic to the extent it seeks third-party information that FIG is obligated to keep confidential.

On all of these grounds, FIG objects to producing, and will not produce, any witnesses to testify regarding this Topic.

**TOPIC NO. 35.**

Communications relating to Netflix's alleged infringement of any of the

Uniloc Asserted Patents.

**RESPONSE TO TOPIC NO. 35.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Topic as vague, ambiguous, overly broad and unduly burdensome in that it requests information from FIG, a non-party to the Netflix Litigation, that Netflix can obtain from other sources, including Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Topic to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Topic to the extent it seeks third-party information that FIG is obligated to keep confidential.

On all of these grounds, FIG objects to producing, and will not produce, any witnesses to testify regarding this Topic.

**TOPIC NO. 36.**

Communications relating to the decision to initiate this Litigation against Netflix.

**RESPONSE TO TOPIC NO. 36.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Topic as vague, ambiguous, overly broad and unduly burdensome in that it requests information from FIG, a non-party to the Netflix Litigation, that Netflix can obtain from other sources, including Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Topic to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any

1 other applicable privilege or protection. FIG also objects to this Topic to the extent  
2 it seeks third-party information that FIG is obligated to keep confidential.

3 On all of these grounds, FIG objects to producing, and will not produce, any  
4 witnesses to testify regarding this Topic.

5 **TOPIC NO. 37.**

6 Valuation of the assertion of the Uniloc Asserted Patents against Netflix.

7 **RESPONSE TO TOPIC NO. 37.**

8 In addition to the General Objections, all of which are incorporated by  
9 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
10 broad and unduly burdensome in that it requests information from FIG, a non-party  
11 to the Netflix Litigation, that Netflix can obtain from other sources, including  
12 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not  
13 relevant to any claims or defenses in the Netflix Litigation and is therefore not  
14 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic  
15 to the extent it seeks information protected by the attorney-client privilege, the  
16 attorney work-product immunity doctrine, the common interest privilege, and any  
17 other applicable privilege or protection. FIG also objects to this Topic to the extent  
18 it seeks third-party information that FIG is obligated to keep confidential.

19 On all of these grounds, FIG objects to producing, and will not produce, any  
20 witnesses to testify regarding this Topic.

21 **TOPIC NO. 38.**

22 Your funding of this Litigation against Netflix.

23 **RESPONSE TO TOPIC NO. 38.**

24 In addition to the General Objections, all of which are incorporated by  
25 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
26 broad and unduly burdensome in that it requests information from FIG, a non-party  
27 to the Netflix Litigation, that Netflix can obtain from other sources, including  
28 Uniloc 2017. FIG objects to the phrase “funding of this Litigation” as vague and

1 ambiguous. FIG also objects to this Topic in that it seeks information that is not  
2 relevant to any claims or defenses in the Netflix Litigation and is therefore not  
3 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic  
4 to the extent it seeks information protected by the attorney-client privilege, the  
5 attorney work-product immunity doctrine, the common interest privilege, and any  
6 other applicable privilege or protection. FIG also objects to this Topic to the extent  
7 it seeks third-party information that FIG is obligated to keep confidential.

8 On all of these grounds, FIG objects to producing, and will not produce, any  
9 witnesses to testify regarding this Topic.

10 **TOPIC NO. 39.**

11 Your financial interest in the outcome of this Litigation against Netflix.

12 **RESPONSE TO TOPIC NO. 39.**

13 In addition to the General Objections, all of which are incorporated by  
14 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
15 broad and unduly burdensome in that it requests information from FIG, a non-party  
16 to the Netflix Litigation, that Netflix can obtain from other sources, including  
17 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not  
18 relevant to any claims or defenses in the Netflix Litigation and is therefore not  
19 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic  
20 to the extent it seeks information protected by the attorney-client privilege, the  
21 attorney work-product immunity doctrine, the common interest privilege, and any  
22 other applicable privilege or protection. FIG also objects to this Topic to the extent  
23 it seeks third-party information that FIG is obligated to keep confidential.

24 On all of these grounds, FIG objects to producing, and will not produce, any  
25 witnesses to testify regarding this Topic.

26 **TOPIC NO. 40.**

27 Your financial gains, profits, or revenues that may be attributed to the '229  
28 Patent.

**RESPONSE TO TOPIC NO. 40.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Topic as vague, ambiguous, overly broad and unduly burdensome in that it requests information from FIG, a non-party to the Netflix Litigation, that Netflix can obtain from other sources, including Uniloc 2017. FIG objects to the phrase “financial gains, profits, or revenues” as vague and ambiguous. FIG also objects to this Topic in that it seeks information that is not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Topic to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Topic to the extent it seeks third-party information that FIG is obligated to keep confidential.

On all of these grounds, FIG objects to producing, and will not produce, any witnesses to testify regarding this Topic.

**TOPIC NO. 41.**

Your financial gains, profits, or revenues that may be attributed to the '609 Patent.

**RESPONSE TO TOPIC NO. 41.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Topic as vague, ambiguous, overly broad and unduly burdensome in that it requests information from FIG, a non-party to the Netflix Litigation, that Netflix can obtain from other sources, including Uniloc 2017. FIG objects to the phrase “financial gains, profits, or revenues” as vague and ambiguous. FIG also objects to this Topic in that it seeks information that is not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects

1 to this Topic to the extent it seeks information protected by the attorney-client  
 2 privilege, the attorney work-product immunity doctrine, the common interest  
 3 privilege, and any other applicable privilege or protection. FIG also objects to this  
 4 Topic to the extent it seeks third-party information that FIG is obligated to keep  
 5 confidential.

6 On all of these grounds, FIG objects to producing, and will not produce, any  
 7 witnesses to testify regarding this Topic.

8 **TOPIC NO. 42.**

9 Your financial gains, profits, or revenues that may be attributed to the '273  
 10 Patent.

11 **RESPONSE TO TOPIC NO. 42.**

12 In addition to the General Objections, all of which are incorporated by  
 13 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
 14 broad and unduly burdensome in that it requests information from FIG, a non-party  
 15 to the Netflix Litigation, that Netflix can obtain from other sources, including  
 16 Uniloc 2017. FIG objects to the phrase "financial gains, profits, or revenues" as  
 17 vague and ambiguous. FIG also objects to this Topic in that it seeks information  
 18 that is not relevant to any claims or defenses in the Netflix Litigation and is  
 19 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
 20 to this Topic to the extent it seeks information protected by the attorney-client  
 21 privilege, the attorney work-product immunity doctrine, the common interest  
 22 privilege, and any other applicable privilege or protection. FIG also objects to this  
 23 Topic to the extent it seeks third-party information that FIG is obligated to keep  
 24 confidential.

25 On all of these grounds, FIG objects to producing, and will not produce, any  
 26 witnesses to testify regarding this Topic.

27 **TOPIC NO. 43.**

28 Your offers, requests, discussion, and negotiations to provide a license to the  
 '229 Patent.

**RESPONSE TO TOPIC NO. 43.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Topic as vague, ambiguous, overly broad and unduly burdensome in that it requests information from FIG, a non-party to the Netflix Litigation. FIG also objects to this Topic in that it seeks information that is not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Topic to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Topic to the extent it seeks third-party information that FIG is obligated to keep confidential.

On all of these grounds, FIG objects to producing, and will not produce, any witnesses to testify regarding this Topic.

**TOPIC NO. 44.**

Your offers, requests, discussion, and negotiations to provide a license to the '609 Patent.

**RESPONSE TO TOPIC NO. 44.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Topic as vague, ambiguous, overly broad and unduly burdensome in that it requests information from FIG, a non-party to the Netflix Litigation. FIG also objects to this Topic in that it seeks information that is not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Topic to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Topic to the extent it seeks third-party information that FIG is obligated to keep

1 confidential.

2 On all of these grounds, FIG objects to producing, and will not produce, any  
3 witnesses to testify regarding this Topic.

4 **TOPIC NO. 45.**

5 Your offers, requests, discussion, and negotiations to provide a license to the  
6 '273 Patent.

7 **RESPONSE TO TOPIC NO. 45.**

8 In addition to the General Objections, all of which are incorporated by  
9 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
10 broad and unduly burdensome in that it requests information from FIG, a non-party  
11 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information  
12 that is not relevant to any claims or defenses in the Netflix Litigation and is  
13 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
14 to this Topic to the extent it seeks information protected by the attorney-client  
15 privilege, the attorney work-product immunity doctrine, the common interest  
16 privilege, and any other applicable privilege or protection. FIG also objects to this  
17 Topic to the extent it seeks third-party information that FIG is obligated to keep  
18 confidential.

19 On all of these grounds, FIG objects to producing, and will not produce, any  
20 witnesses to testify regarding this Topic.

21 **TOPIC NO. 46.**

22 The May 3, 2018 Payoff and Termination Agreement (produced at  
23 UNILOC\_0004017).

24 **RESPONSE TO TOPIC NO. 46.**

25 In addition to the General Objections, all of which are incorporated by  
26 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
27 broad and unduly burdensome in that it requests information from FIG, a non-party  
28 to the Netflix Litigation, that Netflix can obtain from other sources, including  
Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not

1 relevant to any claims or defenses in the Netflix Litigation and is therefore not  
2 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic  
3 to the extent it seeks information protected by the attorney-client privilege, the  
4 attorney work-product immunity doctrine, the common interest privilege, and any  
5 other applicable privilege or protection. FIG also objects to this Topic to the extent  
6 it seeks third-party information that FIG is obligated to keep confidential.

7 On all of these grounds, FIG objects to producing, and will not produce, any  
8 witnesses to testify regarding this Topic.

9 **TOPIC NO. 47.**

10 The relative value of any of the Uniloc Asserted Patents in relation to other  
11 patents, including but not limited to relative value of any of the Uniloc Asserted  
12 Patents compared to other patents that were acquired as part of the same portfolio  
or other patents licensed as part of the same portfolio.

13 **RESPONSE TO TOPIC NO. 47.**

14 In addition to the General Objections, all of which are incorporated by  
15 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
16 broad and unduly burdensome in that it requests information from FIG, a non-party  
17 to the Netflix Litigation, that Netflix can obtain from other sources, including  
18 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not  
19 relevant to any claims or defenses in the Netflix Litigation and is therefore not  
20 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic  
21 to the extent it seeks information protected by the attorney-client privilege, the  
22 attorney work-product immunity doctrine, the common interest privilege, and any  
23 other applicable privilege or protection. FIG also objects to this Topic to the extent  
24 it seeks third-party information that FIG is obligated to keep confidential.

25 On all of these grounds, FIG objects to producing, and will not produce, any  
26 witnesses to testify regarding this Topic.

27 **TOPIC NO. 48.**

28 Any business plan that references this Litigation.

**RESPONSE TO TOPIC NO. 48.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Topic as vague, ambiguous, overly broad and unduly burdensome in that it requests information from FIG, a non-party to the Netflix Litigation, that Netflix can obtain from other sources, including Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Topic to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Topic to the extent it seeks third-party information that FIG is obligated to keep confidential.

On all of these grounds, FIG objects to producing, and will not produce, any witnesses to testify regarding this Topic.

**TOPIC NO. 49.**

Any business plan that references Netflix.

**RESPONSE TO TOPIC NO. 49.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Topic as vague, ambiguous, overly broad and unduly burdensome in that it requests information from FIG, a non-party to the Netflix Litigation. FIG also objects to this Topic in that it seeks information that is not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Topic to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Topic to the extent it seeks third-party information that FIG is obligated to keep confidential.

1 On all of these grounds, FIG objects to producing, and will not produce, any  
2 witnesses to testify regarding this Topic.

3 **TOPIC NO. 50.**

4 Any business plan that references the Uniloc Asserted Patents.

5 **RESPONSE TO TOPIC NO. 50.**

6 In addition to the General Objections, all of which are incorporated by  
7 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
8 broad and unduly burdensome in that it requests information from FIG, a non-party  
9 to the Netflix Litigation, that Netflix can obtain from other sources, including  
10 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not  
11 relevant to any claims or defenses in the Netflix Litigation and is therefore not  
12 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic  
13 to the extent it seeks information protected by the attorney-client privilege, the  
14 attorney work-product immunity doctrine, the common interest privilege, and any  
15 other applicable privilege or protection. FIG also objects to this Topic to the extent  
16 it seeks third-party information that FIG is obligated to keep confidential.

17 On all of these grounds, FIG objects to producing, and will not produce, any  
18 witnesses to testify regarding this Topic.

19 **TOPIC NO. 51.**

20 Any business plan that references the Pendrell Portfolio or any of the assets  
21 therein.

22 **RESPONSE TO TOPIC NO. 51.**

23 In addition to the General Objections, all of which are incorporated by  
24 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
25 broad and unduly burdensome in that it requests information from FIG, a non-party  
26 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information  
27 that is not relevant to any claims or defenses in the Netflix Litigation and is  
28 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
to this Topic to the extent it seeks information protected by the attorney-client

1 privilege, the attorney work-product immunity doctrine, the common interest  
 2 privilege, and any other applicable privilege or protection. FIG also objects to this  
 3 Topic to the extent it seeks third-party information that FIG is obligated to keep  
 4 confidential.

5 On all of these grounds, FIG objects to producing, and will not produce, any  
 6 witnesses to testify regarding this Topic.

7 **TOPIC NO. 52.**

8 Any business plan that references the LINQware Portfolio or any of the  
 9 assets therein.

10 **RESPONSE TO TOPIC NO. 52.**

11 In addition to the General Objections, all of which are incorporated by  
 12 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
 13 broad and unduly burdensome in that it requests information from FIG, a non-party  
 14 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information  
 15 that is not relevant to any claims or defenses in the Netflix Litigation and is  
 16 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
 17 to this Topic to the extent it seeks information protected by the attorney-client  
 18 privilege, the attorney work-product immunity doctrine, the common interest  
 19 privilege, and any other applicable privilege or protection. FIG also objects to this  
 20 Topic to the extent it seeks third-party information that FIG is obligated to keep  
 21 confidential.

22 On all of these grounds, FIG objects to producing, and will not produce, any  
 23 witnesses to testify regarding this Topic.

24 **TOPIC NO. 53.**

25 Any communication to investors that references this Litigation.

26 **RESPONSE TO TOPIC NO. 53.**

27 In addition to the General Objections, all of which are incorporated by  
 28 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
 broad and unduly burdensome in that it requests information from FIG, a non-party

1 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information  
2 that is not relevant to any claims or defenses in the Netflix Litigation and is  
3 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
4 to this Topic to the extent it seeks information protected by the attorney-client  
5 privilege, the attorney work-product immunity doctrine, the common interest  
6 privilege, and any other applicable privilege or protection. FIG also objects to this  
7 Topic to the extent it seeks third-party information that FIG is obligated to keep  
8 confidential.

9 On all of these grounds, FIG objects to producing, and will not produce, any  
10 witnesses to testify regarding this Topic.

11 **TOPIC NO. 54.**

12 Any communication to investors that references Netflix.

13 **RESPONSE TO TOPIC NO. 54.**

14 In addition to the General Objections, all of which are incorporated by  
15 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
16 broad and unduly burdensome in that it requests information from FIG, a non-party  
17 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information  
18 that is not relevant to any claims or defenses in the Netflix Litigation and is  
19 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
20 to this Topic to the extent it seeks information protected by the attorney-client  
21 privilege, the attorney work-product immunity doctrine, the common interest  
22 privilege, and any other applicable privilege or protection. FIG also objects to this  
23 Topic to the extent it seeks third-party information that FIG is obligated to keep  
24 confidential.

25 On all of these grounds, FIG objects to producing, and will not produce, any  
26 witnesses to testify regarding this Topic.

27 **TOPIC NO. 55.**

28 Any communication to investors that references the Uniloc Asserted Patents.

**RESPONSE TO TOPIC NO. 55.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Topic as vague, ambiguous, overly broad and unduly burdensome in that it requests information from FIG, a non-party to the Netflix Litigation. FIG also objects to this Topic in that it seeks information that is not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Topic to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Topic to the extent it seeks third-party information that FIG is obligated to keep confidential.

On all of these grounds, FIG objects to producing, and will not produce, any witnesses to testify regarding this Topic.

**TOPIC NO. 56.**

Any communication to investors that references the Pendrell Portfolio or any of the assets therein.

**RESPONSE TO TOPIC NO. 56.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Topic as vague, ambiguous, overly broad and unduly burdensome in that it requests information from FIG, a non-party to the Netflix Litigation. FIG also objects to this Topic in that it seeks information that is not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Topic to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Topic to the extent it seeks third-party information that FIG is obligated to keep

1 confidential.

2 On all of these grounds, FIG objects to producing, and will not produce, any  
3 witnesses to testify regarding this Topic.

4 **TOPIC NO. 57.**

5 Any communication to investors that references the LINQware Portfolio or  
6 any of the assets therein.

7 **RESPONSE TO TOPIC NO. 57.**

8 In addition to the General Objections, all of which are incorporated by  
9 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
10 broad and unduly burdensome in that it requests information from FIG, a non-party  
11 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information  
12 that is not relevant to any claims or defenses in the Netflix Litigation and is  
13 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
14 to this Topic to the extent it seeks information protected by the attorney-client  
15 privilege, the attorney work-product immunity doctrine, the common interest  
16 privilege, and any other applicable privilege or protection. FIG also objects to this  
17 Topic to the extent it seeks third-party information that FIG is obligated to keep  
18 confidential.

19 On all of these grounds, FIG objects to producing, and will not produce, any  
20 witnesses to testify regarding this Topic.

21 **TOPIC NO. 58.**

22 Any communication with or report to Softbank Corp. regarding this  
23 Litigation.

24 **RESPONSE TO TOPIC NO. 58.**

25 In addition to the General Objections, all of which are incorporated by  
26 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
27 broad and unduly burdensome in that it requests information from FIG, a non-party  
28 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information  
that is not relevant to any claims or defenses in the Netflix Litigation and is

1 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
 2 to this Topic to the extent it seeks information protected by the attorney-client  
 3 privilege, the attorney work-product immunity doctrine, the common interest  
 4 privilege, and any other applicable privilege or protection. FIG also objects to this  
 5 Topic to the extent it seeks third-party information that FIG is obligated to keep  
 6 confidential.

7 On all of these grounds, FIG objects to producing, and will not produce, any  
 8 witnesses to testify regarding this Topic.

9 **TOPIC NO. 59.**

10 Any communication with or report to Softbank Corp. regarding Netflix.

11 **RESPONSE TO TOPIC NO. 59.**

12 In addition to the General Objections, all of which are incorporated by  
 13 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
 14 broad and unduly burdensome in that it requests information from FIG, a non-party  
 15 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information  
 16 that is not relevant to any claims or defenses in the Netflix Litigation and is  
 17 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
 18 to this Topic to the extent it seeks information protected by the attorney-client  
 19 privilege, the attorney work-product immunity doctrine, the common interest  
 20 privilege, and any other applicable privilege or protection. FIG also objects to this  
 21 Topic to the extent it seeks third-party information that FIG is obligated to keep  
 22 confidential.

23 On all of these grounds, FIG objects to producing, and will not produce, any  
 24 witnesses to testify regarding this Topic.

25 **TOPIC NO. 60.**

26 Any communication with or report to Softbank Corp. regarding the Uniloc  
 27 Asserted Patents.

28 **RESPONSE TO TOPIC NO. 60.**

In addition to the General Objections, all of which are incorporated by

1 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
2 broad and unduly burdensome in that it requests information from FIG, a non-party  
3 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information  
4 that is not relevant to any claims or defenses in the Netflix Litigation and is  
5 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
6 to this Topic to the extent it seeks information protected by the attorney-client  
7 privilege, the attorney work-product immunity doctrine, the common interest  
8 privilege, and any other applicable privilege or protection. FIG also objects to this  
9 Topic to the extent it seeks third-party information that FIG is obligated to keep  
10 confidential.

11 On all of these grounds, FIG objects to producing, and will not produce, any  
12 witnesses to testify regarding this Topic.

13 **TOPIC NO. 61.**

14 Any communication with or report to Softbank Corp. regarding the Pendrell  
15 Portfolio or any of the assets therein.

16 **RESPONSE TO TOPIC NO. 61.**

17 In addition to the General Objections, all of which are incorporated by  
18 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
19 broad and unduly burdensome in that it requests information from FIG, a non-party  
20 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information  
21 that is not relevant to any claims or defenses in the Netflix Litigation and is  
22 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
23 to this Topic to the extent it seeks information protected by the attorney-client  
24 privilege, the attorney work-product immunity doctrine, the common interest  
25 privilege, and any other applicable privilege or protection. FIG also objects to this  
26 Topic to the extent it seeks third-party information that FIG is obligated to keep  
27 confidential.

28 On all of these grounds, FIG objects to producing, and will not produce, any

1 witnesses to testify regarding this Topic.

2 **TOPIC NO. 62.**

3 Any communication with or report to Softbank Corp. regarding the  
4 LINQware Portfolio or any of the assets therein.

5 **RESPONSE TO TOPIC NO. 62.**

6 In addition to the General Objections, all of which are incorporated by  
7 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
8 broad and unduly burdensome in that it requests information from FIG, a non-party  
9 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information  
10 that is not relevant to any claims or defenses in the Netflix Litigation and is  
11 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
12 to this Topic to the extent it seeks information protected by the attorney-client  
13 privilege, the attorney work-product immunity doctrine, the common interest  
14 privilege, and any other applicable privilege or protection. FIG also objects to this  
15 Topic to the extent it seeks third-party information that FIG is obligated to keep  
16 confidential.

17 On all of these grounds, FIG objects to producing, and will not produce, any  
18 witnesses to testify regarding this Topic.

19 **TOPIC NO. 63.**

20 Any forecasts and/or outlook on any possible results related to this Litigation,  
21 Netflix, the Uniloc Asserted Patents, the Pendrell Portfolio or any of the assets  
22 therein, and/or LINQware Portfolio or any of the assets therein.

23 **RESPONSE TO TOPIC NO. 63.**

24 In addition to the General Objections, all of which are incorporated by  
25 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
26 broad and unduly burdensome in that it requests information from FIG, a non-party  
27 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information  
28 that is not relevant to any claims or defenses in the Netflix Litigation and is  
therefore not proportional to the needs of the Netflix Litigation. FIG further objects

1 to this Topic to the extent it seeks information protected by the attorney-client  
 2 privilege, the attorney work-product immunity doctrine, the common interest  
 3 privilege, and any other applicable privilege or protection. FIG also objects to this  
 4 Topic to the extent it seeks third-party information that FIG is obligated to keep  
 5 confidential.

6 On all of these grounds, FIG objects to producing, and will not produce, any  
 7 witnesses to testify regarding this Topic.

8 **TOPIC NO. 64.**

9 Communications relating to patent assertion strategy involving any of the  
 10 Uniloc Asserted Patents or any patent portfolio(s) that include any of the Uniloc  
 11 Asserted Patents.

12 **RESPONSE TO TOPIC NO. 64.**

13 In addition to the General Objections, all of which are incorporated by  
 14 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
 15 broad and unduly burdensome in that it requests information from FIG, a non-party  
 16 to the Netflix Litigation, that Netflix can obtain from other sources, including  
 17 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not  
 18 relevant to any claims or defenses in the Netflix Litigation and is therefore not  
 19 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic  
 20 to the extent it seeks information protected by the attorney-client privilege, the  
 21 attorney work-product immunity doctrine, the common interest privilege, and any  
 22 other applicable privilege or protection. FIG also objects to this Topic to the extent  
 23 it seeks third-party information that FIG is obligated to keep confidential.

24 On all of these grounds, FIG objects to producing, and will not produce, any  
 25 witnesses to testify regarding this Topic.

26 **TOPIC NO. 65.**

27 Communications relating to Softbank Corp.'s decision to invest in You,  
 28 including but not limited to any valuation conducted by Softbank Corp. of the  
 Uniloc Asserted Patents or any patent portfolio(s) that include any of the Uniloc  
 Asserted Patents.

**RESPONSE TO TOPIC NO. 65.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Topic as vague, ambiguous, overly broad and unduly burdensome in that it requests information from FIG, a non-party to the Netflix Litigation. FIG also objects to this Topic in that it seeks information that is not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Topic to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Topic to the extent it seeks third-party information that FIG is obligated to keep confidential.

On all of these grounds, FIG objects to producing, and will not produce, any witnesses to testify regarding this Topic.

**TOPIC NO. 66.**

Communications relating to any agreement involving Your investment in or ownership of any patent assertion entity and the reasons for any subsequent change or modification in the terms of any such agreement.

**RESPONSE TO TOPIC NO. 66.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Topic as vague, ambiguous, overly broad and unduly burdensome in that it requests information from FIG, a non-party to the Netflix Litigation. FIG also objects to this Topic in that it seeks information that is not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Topic to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Topic to the extent it seeks third-party information that FIG is obligated to keep

1 confidential.

2 On all of these grounds, FIG objects to producing, and will not produce, any  
3 witnesses to testify regarding this Topic.

4 **TOPIC NO. 67.**

5 Communications relating to Your strategy to drive up the costs of defense in  
6 any patent assertion campaigns in which You are a party.

7 **RESPONSE TO TOPIC NO. 67.**

8 In addition to the General Objections, all of which are incorporated by  
9 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
10 broad and unduly burdensome in that it requests information from FIG, a non-party  
11 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information  
12 that is not relevant to any claims or defenses in the Netflix Litigation and is  
13 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
14 to this Topic to the extent it seeks information protected by the attorney-client  
15 privilege, the attorney work-product immunity doctrine, the common interest  
16 privilege, and any other applicable privilege or protection. FIG also objects to this  
17 Topic to the extent it seeks third-party information that FIG is obligated to keep  
18 confidential.

19 On all of these grounds, FIG objects to producing, and will not produce, any  
20 witnesses to testify regarding this Topic.

21 **TOPIC NO. 68.**

22 Communications relating to the amount of control exercised by You in  
23 Uniloc 2017 and/or Uniloc.

24 **RESPONSE TO TOPIC NO. 68.**

25 In addition to the General Objections, all of which are incorporated by  
26 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
27 broad and unduly burdensome in that it requests information from FIG, a non-party  
28 to the Netflix Litigation, that Netflix can obtain from other sources, including  
Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not

1 relevant to any claims or defenses in the Netflix Litigation and is therefore not  
2 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic  
3 to the extent it seeks information protected by the attorney-client privilege, the  
4 attorney work-product immunity doctrine, the common interest privilege, and any  
5 other applicable privilege or protection. FIG also objects to this Topic to the extent  
6 it seeks third-party information that FIG is obligated to keep confidential.

7 On all of these grounds, FIG objects to producing, and will not produce, any  
8 witnesses to testify regarding this Topic.

9 **TOPIC NO. 69.**

10 The identity and location of all Persons with knowledge regarding each of the  
11 above deposition topics.

12 **RESPONSE TO TOPIC NO. 69.**

13 In addition to the General Objections, all of which are incorporated by  
14 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly  
15 broad and unduly burdensome in that it requests information from FIG, a non-party  
16 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information  
17 that is not relevant to any claims or defenses in the Netflix Litigation and is  
18 therefore not proportional to the needs of the Netflix Litigation. FIG further objects  
19 to this Topic to the extent it seeks information protected by the attorney-client  
20 privilege, the attorney work-product immunity doctrine, the common interest  
21 privilege, and any other applicable privilege or protection. FIG also objects to this  
22 Topic to the extent it seeks third-party information that FIG is obligated to keep  
23 confidential.

24 On all of these grounds, FIG objects to producing, and will not produce, any  
25 witnesses to testify regarding this Topic.

26 **TOPIC NO. 70.**

27 The identity, location, and content of all Documents relating to each of the  
28 above deposition topics.

**RESPONSE TO TOPIC NO. 70.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Topic as vague, ambiguous, overly broad and unduly burdensome in that it requests information from FIG, a non-party to the Netflix Litigation. FIG also objects to this Topic in that it seeks information that is not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Topic to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Topic to the extent it seeks third-party information that FIG is obligated to keep confidential.

On all of these grounds, FIG objects to producing, and will not produce, any witnesses to testify regarding this Topic.

**TOPIC NO. 71.**

The identity, location, and content of Documents You produced and Documents You identified but did not produce in response to the subpoena and accompanying Exhibit A.

**RESPONSE TO TOPIC NO. 71.**

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Topic as vague, ambiguous, overly broad and unduly burdensome in that it requests information from FIG, a non-party to the Netflix Litigation. FIG also objects to this Topic in that it seeks information that is not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Topic to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Topic to the extent it seeks third-party information that FIG is obligated to keep

1 confidential.

2 On all of these grounds, FIG objects to producing, and will not produce, any  
3 witnesses to testify regarding this Topic.

4  
5 Respectfully submitted,

6 Dated: July 1, 2020

/s/ Jeremiah A. Armstrong  
Jeremiah A. Armstrong

8  
9 Attorneys for Third Party  
Fortress Investment Group, LLC

**CERTIFICATE OF SERVICE**

I, Jeremiah A. Armstrong, declare: I am a citizen of the United States and employed in Burlingame, California. I am over the age of eighteen years old and not a party to the within-entitled action. Today I served a copy of the foregoing document via email to the following:

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Dated: July 1, 2020

/s/ Jeremiah A. Armstrong  
Jeremiah A. Armstrong